

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW MEXICO**

In re:

ROMAN CATHOLIC CHURCH OF THE  
ARCHDIOCESE OF SANTA FE, a New Mexico  
corporation sole,

Debtor.

Chapter 11

Case No. 18-13027-t11

**SECOND INTERIM APPLICATION FOR ALLOWANCE AND PAYMENT  
OF PROFESSIONAL COMPENSATION AND REIMBURSEMENT OF  
EXPENSES BY PACHULSKI STANG ZIEHL & JONES LLP FOR THE  
PERIOD FROM OCTOBER 1, 2019 THROUGH OCTOBER 31, 2021**

Pachulski Stang Ziehl & Jones LLP (“PSZJ”), counsel for the Official Committee of Unsecured Creditors (the “Committee”) of the Roman Catholic Church of the Archdiocese of Santa Fe (the “Debtor”), hereby files its *Second Interim Application for Allowance and Payment of Professional Fees and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP for the Period From October 1, 2019 through October 31, 2021* (the “Application”) pursuant to 11 U.S.C. § 330, Federal Rule of Bankruptcy Procedure 2016, NM LBR 2016-1.1, the United States Trustee’s *Operating Guidelines and Reporting Requirements for Debtors in Possession and Trustees*, revised June 11, 2012 (and including any further amendments) (the “UST Guidelines”), and the *Order Authorizing and Approving the Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors* [Docket No. 60], entered on March 3, 2014. This Application is supported by the following: (1) the Declaration of James I. Stang, attached hereto at **Exhibit E**, in which Mr. Stang, a partner of PSZJ, has verified the statements PSZJ has made in the Application, and has confirmed PSZJ’s compliance with 11 U.S.C. § 504, Federal Rule of Bankruptcy Procedure 2016, NM LBR 2016-1.1, and the UST Guidelines;

(2) Exhibits A-D attached to the Application, which provide descriptions of PSZJ's professional services and expenses incurred during the Compensation Period; and (3) the entire record before the Court in the above-captioned case. In support of its Application, PSZJ respectfully states as follows:

### **Relief Requested**

1. Pursuant to this Application, PSZJ requests that the Court enter an order allowing on an interim basis PSZJ's fees in the amount of \$1,845,843.00<sup>1</sup> and expenses in the amount of \$39,353.58 incurred during the period October 1, 2019 through October 31, 2021 (the "Compensation Period") for a total allowed amount of \$1,885,196.58, and ordering the Debtor to pay PSZJ \$1,384,382.25 in fees (comprising 75% of the allowed amount) and \$39,353.58 in expenses (comprising 100% of the allowed amount) less amounts paid for the Compensation Period (\$1,072,379.81) on an interim basis for a total additional interim payment of \$351,356.02. This Application presents a core proceeding over which the Court has jurisdiction to enter a final decision pursuant to 28 U.S.C. § 157(a)-(b) and 28 U.S.C. § 1334.

### **General Background**

2. On December 3, 2018 (the "Petition Date"), the Debtor commenced its chapter 11 case by filing a voluntary petition for relief under chapter 11 of Title 11 of the United States Code (as amended from time to time, the "Bankruptcy Code"). The Debtor is authorized to operate its businesses as a debtor-in-possession. To date, no trustee or examiner has been appointed in this case.

---

<sup>1</sup> This amount reflects a reduction of \$1,270.00 to reduce the billing rates for Stanley Goldich and William Ramseyer to the agreed upon rates of \$675.00.

3. On or about December 18, 2018, the United States Trustee (the “U.S. Trustee”) appointed the Official Committee of Unsecured Creditors (the “Committee”) to represent the Debtor’s unsecured creditors. *See Appointment of a Committee of Unsecured Creditors in a Chapter 11 Case* [Docket No. 53]. The Committee is comprised of nine (9) survivors of sexual abuse by individuals for whom the Debtor was responsible. No other Committee has been appointed in this case.

4. On December 26, 2018, the Committee filed an application with the Court for authorization to employ PSZJ pursuant to Bankruptcy Code sections 327 and 1102, and Federal Rule of Bankruptcy Procedure 2014. *See Application of the Official Committee of Unsecured Creditors for Entry of an Order, Pursuant to 11 U.S.C. § § 327 and 1103, and Fed. R. Bank. P. 2014, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors Effective December 18, 2018* [Doc. 54] (the “PSZJ Employment Application”).

5. On January 4, 2019, the Court entered an order authorizing the Committee to employ PSZJ as counsel effective as of December 18, 2018. *See Order Authorizing Employment of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors* [Docket No. 60] (the “PSZJ Employment Order”).

6. Pursuant to the PSZJ Employment Order, upon Court approval, the Debtor is authorized to pay PSZJ interim compensation in the amount of 75% of billed fees and 100% of reimbursable costs on paid fees and costs. *See PSZJ Employment Order*, ¶ 3.

### **Case Status**

7. The Debtor commenced its Case in order to address its liability for sexual abuse perpetrated by priests and others for whom the Diocese was responsible. During the

Compensation Period, PSZJ continued its efforts to understand claims against the Debtor and the assets available to pay those claims. The objective of these efforts is to negotiate a plan of reorganization that embodies a settlement of sexual abuse claims asserted against the Debtor or, if necessary, to litigate matters that clarify the scope of the Debtor's assets or recover assets for the benefit of the estate. These tasks primarily consisted of: analyzing documents produced by the Debtor and other entities; reviewing the Debtor's assets; assessing the value of the Debtor's assets; engaging in litigation with the Debtor and other parties; reviewing and analyzing the Debtor's insurance policies; negotiating nondisclosure agreements with the Debtor and other entities; preparing for and participating in mediation sessions with the Debtor and other entities; meeting with the Committee and State Court Counsel regularly to advise them of various matters in the chapter 11 case; and advising the Committee regarding pleadings and litigation relating to the Debtor's chapter 11 case.

#### **Prior Compensation**

8. This Application is the second application that PSZJ has filed in this case for allowance and payment of professional fees and reimbursement of expenses. PSZJ filed and served a first interim fee application covering the time period December 18, 2018 through September 30, 2019 [dock. 283] requesting \$402,065.00 in fees and \$10,480.04 in expenses. Pursuant to the Employment Order, PSZJ was paid \$301,548.75 in fees and \$10,480.04 in expenses, for a total of \$312,028.79. In addition to payments received for the first interim period, PSZJ also has received \$1,072,379.81 in fees and expenses for invoices billed during the second interim period.

**Summary of PSZJ'S Legal Services and  
Expenses Incurred During the Compensation Period**

9. PSZJ maintains contemporaneous records of the time it expends for professional services it performs and expenses it incurs in connection with this case. PSZJ maintains these detailed records in the ordinary course of its business. **Exhibit A** provides a summary of these incurred fees and expenses during the Compensation Period.

10. By this Application and pursuant to the PSZJ Employment Order, PSZJ seeks (a) interim allowance of all fees and costs incurred during the Compensation Period, and (b) payment of 75% of its fees, in the amount of \$1,384,382.25, plus 100% of its expenses, in the amount of \$39,353.58, for a total of \$1,423,735.83 less amounts paid during the Compensation Period (\$1,072,379.81). PSZJ notes that its fees and expenses are those that PSZJ customarily charges to other clients in the ordinary course of its practice, with the exception of the reduction of all of its attorneys' hourly billing rates to a maximum of \$675.00 per hour.

11. To assist the Court in its review of PSZJ's fees and expenses, **Exhibit B** contains PSZJ's bills for the Compensation Period, **Exhibit C** contains a summary of PSZJ's bills, separated into subject matter categories relating specifically to this chapter 11 case, and **Exhibit D** contains a summary of expenses incurred by PSZJ by category.

**Summary of Legal Services Performed**

12. Set forth below is a summary of legal services provided by PSZJ. Such services are described in detail in the fee statements attached hereto as **Exhibit B** and such statements are incorporated herein by reference for all purposes. PSZJ in some instances billed

for similar services in several difference categories. Such billing did not result in any duplication of services, or charges for such services.

**B. Asset Analysis/Recovery:**  
**63.50 Hours Expended and \$42,285.00 of Fees Incurred**

13. Work performed in this category relates to PSZJ's efforts to assess the Debtor's assets, claims available to the Debtor's estate, and sources of recovery for creditors of the Debtor's estate. In this case, asset analysis is particularly important in order to value the Debtor's assets and investigate claims against third parties in order to maximize value available to pay creditors. Specifically, during the Compensation Period, the Firm, among other things:

(1) reviewed and analyzed documents produced by The Catholic Foundation and prepared a spreadsheet identifying donor restricted funds; (2) reviewed and analyzed Franciscan claims; (3) reviewed and analyzed Franciscan documents; (4) reviewed and analyzed Catholic Cemetery Association documents and 2006 finance committee minutes; (5) performed research regarding alter ego theories; (6) reviewed and analyzed a revised property list; (7) reviewed and analyzed art appraisal issues; (8) performed work regarding a real property analysis; (9) reviewed and revised a memorandum to the Committee regarding subsidiary assets; (10) performed work regarding a property valuation analysis; (11) reviewed and analyzed issues regarding discrepancies in property disclosures; (12) reviewed and analyzed deeds; (13) performed work regarding property reconciliation issues; (14) reviewed and analyzed a property spreadsheet from the Debtor; (15) reviewed and analyzed issues regarding St. John Baptist; (16) reviewed and analyzed an Archdiocese property analysis; (17) reviewed and analyzed issues regarding the value of artwork and collectibles; (18) prepared for and attended a status conference on March 8,

2021; (19) reviewed and analyzed real estate sales issues; (20) reviewed and analyzed insurance settlement demands; and (21) corresponded and conferred regarding asset analysis and recovery issues.

**C. Asset Disposition:**  
**41.30 Hours Expended and \$27,877.50 of Fees Incurred**

14. Work in this category relates to services performed by PSZJ regarding asset sales and disposition. During the Compensation Period, PSZJ, among other things:

(1) prepared for and attended a meeting on November 19, 2019 regarding real property sales; (2) performed work regarding a real estate non-disclosure agreement; (3) reviewed and analyzed the Geltmore property purchase proposal; (4) performed work regarding an unauthorized lease for community garden property; (5) reviewed and analyzed the Debtor's response to a purchase offer, and performed work regarding a letter concerning the sale of real property; (6) prepared for and participated in a conference call on March 19, 2020 with the Debtor's counsel regarding asset sales; (7) prepared for and participated in a conference call on March 26, 2020 with the Debtor's counsel, State Court Counsel and the Committee chair regarding real estate disposition issues; (8) reviewed and analyzed listing agreements; (9) performed work regarding real estate sales issues; (10) reviewed and analyzed real estate value issues; (11) reviewed and analyzed issues regarding the sale of a house; (12) reviewed and analyzed marketing issues; (13) reviewed and analyzed issues regarding the Lamplighter property; (14) reviewed and analyzed real estate purchase offers; (15) reviewed and analyzed a sales analysis regarding three properties; (16) monitored the status of offers; (17) reviewed and analyzed media and dockets regarding real estate sales; (18) prepared for and participated in a telephonic conference with Debtor's counsel

on September 18, 2020 regarding Carmelite property and other property status; (19) reviewed and analyzed documents regarding asset sales; (20) reviewed and analyzed a motion to sell property in Raton, New Mexico; (21) reviewed and analyzed an Asset Purchase Agreement regarding IHM property; (22) reviewed and analyzed IHM sales issues; (23) reviewed and analyzed real property sale motions; (24) attended to media issues regarding the IHRC sale; (25) reviewed and analyzed a Debtor real estate report; (26) reviewed and analyzed auction site issues; (27) performed work regarding a stipulation related to sale of property owned by trust; and (28) conferred and corresponded regarding asset disposition issues.

**D. Appeals:**

**366.50 Hours Expended and \$246,947.50 of Fees Incurred**

15. Work in this category relates to services performed by PSZJ relating to appellate issues. During the Compensation Period, PSZJ, among other things: (1) reviewed and analyzed stay pending appeal issues; (2) performed legal research; (3) reviewed and analyzed jurisdictional issues; (4) reviewed and analyzed issues regarding interlocutory and final orders; (5) performed work regarding an opposition to stay motion; (6) performed work regarding a scheduling stipulation; (7) attended to timing and deadline issues; (8) prepared for and attended a telephonic preliminary hearing on November 11, 2020 regarding the motion for stay pending appeal; (9) performed work regarding a scheduling order; (10) reviewed and analyzed an order to show cause regarding interlocutory order; (11) reviewed and analyzed Bankruptcy Appellate Panel (“BAP”) rules regarding statements, *pro hac* admissions and briefing issues; (12) reviewed and analyzed notices of appeal and order of joinder; (13) performed work regarding settlement discussions with the Debtor; (14) reviewed and analyzed a BAP statement regarding Parish



defendants as interested parties; (15) reviewed and analyzed a designation of record and performed work regarding a counter designation; (16) reviewed and analyzed BAP certification issues; (17) reviewed and analyzed issues regarding the collateral order doctrine; (18) reviewed and analyzed an order to show cause (“OSC”), and briefs of the Debtor and Parishes regarding the OSC; (19) prepared for and attended a scheduling conference on December 7, 2020; (20) performed work regarding a response to OSC regarding interlocutory order and leave to appeal; (21) reviewed and analyzed issues regarding direct certification of appeal; (22) performed work regarding a motion to exceed page limits; (23) reviewed and analyzed a Parish opposition to motion to dismiss appeal; (24) reviewed and analyzed issues regarding ministerial exception relating to stay pending appeal; (25) performed work regarding a stipulation for extension of time to file reply regarding motion to dismiss for lack of standing; (26) reviewed and analyzed authorities cited by Parishes regarding standing and affirmative defenses; (27) reviewed and analyzed issues regarding First Amendment and collateral order doctrine and limitations on ministerial exception; (28) performed work regarding a reply to opposition to motion to dismiss Parishes and trusts from appeal; (29) performed work regarding a response to the court’s request for information; (30) reviewed and analyzed a motion for certification of BAP appeal to the Tenth Circuit; (31) reviewed and analyzed direct appeal and leave to appeal issues; (32) reviewed and analyzed issues regarding church autonomy doctrine; (33) reviewed and analyzed the Fox declaration regarding Canon Law and Parish history; (34) performed work regarding a stipulation and order regarding extension of time to file opposition to direct appeal certification; (35) reviewed and analyzed the BAP order denying

stipulation for extension and performed work regarding a revised stipulation; (36) performed work regarding an opposition to motion for direct certification of appeal; (37) reviewed and analyzed standing issues; (38) reviewed and analyzed issues regarding the entanglement doctrine; (39) reviewed and analyzed issues regarding religious liberty defenses; (40) reviewed and analyzed Tenth Circuit rules regarding briefing, timing, and modification of rules; (41) reviewed and analyzed a supplemental submission of authorities by Parishes in opposition to motion to dismiss appeal and performed work regarding a response; (42) reviewed and analyzed the Parish reply to opposition to motion for direct appeal; (43) reviewed and analyzed the BAP opinion regarding Tenth Circuit certification issues; (44) reviewed and analyzed the Parish compliance certificate; (45) performed work regarding a stipulation to continue appeal dates; (46) reviewed and analyzed issues regarding a joint status report; (47) reviewed and analyzed dockets regarding status conference; and (48) conferred and corresponded regarding appellate issues.

**E. Bankruptcy Litigation\Litigation:  
726.30 Hours Expended and \$488,570.00 of Fees Incurred**

16. This category relates to services provided by PSZJ with respect to litigation matters in this case. During the Compensation Period, PSZJ, among other things: (1) reviewed and analyzed litigation options; (2) performed work regarding avoidance complaints; (3) performed work regarding standing motions; (4) performed work regarding a reply brief to opposition to standing motion; (5) performed legal research; (6) reviewed and analyzed RFRA and First Amendment issues; (7) reviewed and analyzed issues regarding unincorporated associations; (8) reviewed and analyzed certification of trust issues; (9) reviewed

and analyzed an amended list of real property and its impact on proposed avoidance complaints; (10) reviewed and analyzed a revised spreadsheet from the Debtor regarding property transfers; (11) reviewed and analyzed a supplemental declaration in support of Parish opposition to motion for standing; (12) performed work regarding a memorandum regarding issues relating to unincorporated associations; (13) prepared for and attended a status conference on July 23, 2020 regarding standing motion; (14) reviewed and analyzed issues regarding the Revised Uniform Unincorporated Nonprofit Act; (15) reviewed and analyzed issues regarding resulting trusts; (16) reviewed and analyzed a mediation counter-offer from the Debtor; (17) drafted complaints regarding Real Estate Trust and Section 544(a)(3); (18) reviewed and analyzed issues regarding Community Garden properties; (19) reviewed and analyzed Secretary of State information regarding Parish defendants; (20) reviewed and analyzed discovery issues related to dismissal motion; (21) performed work regarding adversary complaint exhibits; (22) reviewed and analyzed certifications of trust and unrecorded Parish interests; (23) prepared for and attended a hearing on August 28, 2020 regarding the standing motion; (24) reviewed and analyzed issues regarding the good faith defense; (25) reviewed and analyzed finance committee meeting minutes and performed work regarding an initial discovery list; (26) reviewed and analyzed issues regarding a motion to abandon related to Carmelite; (27) performed work regarding the DLF complaint; (28) reviewed and analyzed an opinion and order granting motion for standing; (29) reviewed and revised complaints regarding Real Estate Trust and unrecorded interests; (30) performed work regarding *pro hac vice* applications; (31) prepared for and attended a telephonic conference with State Court Counsel regarding litigation strategy in light of order

granting standing to file complaints; (32) reviewed and revised the DLF Trust complaint regarding Parish defendants; (33) reviewed and analyzed issues regarding appellate issues relating to standing order; (34) reviewed and analyzed issues regarding examiner powers; (35) reviewed and analyzed issues regarding the First Amendment and execution liens; (36) reviewed and analyzed Local Rules regarding discovery issues; (37) reviewed and analyzed motions for reconsideration of order granting standing and for stay pending appeal; (38) reviewed and analyzed FRCP 59(e) standards and waiver issues; (39) performed work regarding a memorandum relating to reconsideration standards and waiver based on absence of prior argument; (40) performed work regarding an opposition to motion for stay pending appeal; (41) reviewed and analyzed the Debtor's mission critical property claims; (42) reviewed and analyzed issues regarding retention of examiner with expanded powers; (43) reviewed and analyzed issues regarding appellate review of derivative standing; (44) reviewed and analyzed property administration issues; (45) performed work regarding a stipulated order granting standing; (46) reviewed and analyzed issues regarding Section 1107(a) and the authority of the Court to appoint a trustee with limited powers; (47) performed work regarding a memorandum relating to examiner and trustee authority issues; (48) reviewed and analyzed summary adjudication issues; (49) reviewed and analyzed answers and affirmative defenses of defendants; (50) performed work regarding a partial summary judgment motion relating to Real Estate Trust defenses; (51) reviewed and analyzed issues regarding the autonomy doctrine; (52) reviewed and analyzed undisputed facts regarding summary judgment motion; (53) performed work regarding a motion for partial summary judgment on RFRA, Church Autonomy and First Amendment

issues; (54) performed work regarding a response to the Court's request for information in connection with status conference; (55) performed work regarding a motion for summary judgment regarding the lack of capacity of the Parishes to be beneficiaries of a trust prior to incorporation; (56) reviewed and analyzed issues regarding the status of summary judgment motions in pending adversary proceedings relating to real and personal property; (57) performed work regarding a status conference statement response; (58) reviewed and analyzed issues regarding the Unincorporated Associations Act; (59) reviewed and analyzed answers to DLF Trust and Unrecorded Interests complaints regarding affirmative defenses and parties; (60) reviewed and analyzed exhibits to the Salgado Declaration regarding DLF Trust and bank statements; (61) reviewed and analyzed the Debtor's response to notice of hearing regarding fees, status of adversary proceedings and insurance issues, and performed work regarding a response; (62) prepared for and attended a status conference on January 26, 2021; (63) attended to issues regarding a motion for stay pending appeal; (64) reviewed and analyzed issues regarding consolidated trust defenses; (65) reviewed and analyzed declarations regarding Parish history and formation relating to motion for summary judgment; (66) reviewed and analyzed scheduling orders and opinion denying motion for stay pending appeal; (67) performed work regarding a stipulation relating to filing summary judgment motions in one case applicable to all three cases; (68) reviewed and revised the motion for summary judgment in light of comments and a review of declarations and answers; (69) reviewed and analyzed issues regarding briefing timing issues; (70) reviewed and analyzed issues regarding resulting trusts; (71) reviewed and analyzed issues regarding legal capacity and charitable trust doctrine; (72) reviewed and

analyzed the current status of appeals and attended to scheduling issues; (73) reviewed and analyzed issues regarding common law trust and trust beneficiary issues; (74) reviewed and analyzed issues regarding the merger doctrine and trusts; (75) reviewed and analyzed issues regarding resulting and constructive trusts; (76) reviewed and analyzed common law exceptions to unincorporated associations as legal entities capable of receiving property in trust; (77) performed work regarding declarations and notices regarding motions for summary judgment relating to religious liberty defense and trust beneficiary status; (78) reviewed and analyzed issues regarding ecclesiastical abstention; (79) reviewed and analyzed issues regarding appellate court as binding authority; (80) prepared for and attended a scheduling conference on March 8, 2021; (81) reviewed and analyzed a petition for Tenth Circuit review, and attended to deadline issues; (82) reviewed and analyzed a media report regarding avoidance action litigation and settlement; (83) reviewed and analyzed insurance settlement issues; (84) reviewed and analyzed issues regarding the Diocese of Agana litigation, including the issue of parishes as a division of diocese; (85) prepared for and attended a status conference on May 3, 2021; (86) prepared for and attended a status conference on June 14, 2021 regarding fraudulent transfer adversary proceedings; (87) reviewed and analyzed a Chapter 7 trustee's motion regarding ownership of claims and performed work regarding a response; (88) performed work regarding a proposed stipulation with Chapter 7 trustee; (89) reviewed and analyzed issues regarding an arbitration sealing motion and order; (90) reviewed and analyzed insurer objections to the motion to seal documents; (91) reviewed and analyzed briefs on motion to seal and transcript of hearing in preparation for hearing on form of order; (92) reviewed and analyzed insurers' objection to

motion to compel arbitration and prepared for and attended a hearing on September 13, 2021; (93) prepared for and attended a telephonic conference with State Court Counsel on September 20, 2021 regarding status of sealed pleadings and arbitration issues; (94) prepared for and attended a telephonic conference on September 24, 2021 with State Court Counsel regarding briefing issues; (95) reviewed and analyzed issues regarding a motion to withdraw the reference; (96) reviewed and analyzed the St. Paul surreply; (97) attended to timing issues; (98) prepared for and attended a telephonic conference on October 15, 2021 with State Court Counsel regarding the arbitration motion; (99) reviewed and analyzed a motion by Arrowood; (100) prepared for and attended a hearing on October 25, 2021 regarding arbitration motion; and (101) corresponded and conferred regarding litigation issues.

**F. Case Administration:**  
**1.00 Hours Expended and \$675.00 of Fees Incurred**

17. This category relates to case administration matters in this case. During the Compensation Period, PSZJ, among other things: (1) prepared for and met with State Court Counsel on October 6, 2019 regarding the mediation process; (2) reviewed and analyzed standing objection issues; (3) reviewed and analyzed status conference issues; and (4) attended to calendaring and deadline issues.

**G. Claims Objection/Administration:**  
**26.80 Hours Expended and \$13,750.00 of Fees Incurred**

18. This category relates to services provided by PSZJ with respect to administering, reviewing, and assessing claims against the Debtor. During the Compensation Period, PSZJ, among other things: (1) reviewed and analyzed issues regarding Debtor questions

on claims; (2) responded to inquiries regarding claims; (3) performed work regarding emails and letters to unrepresented claimants relating to questions from the Debtor and insurers; (4) reviewed and analyzed issues regarding Chapter 7 tort claimants in the Davenport Diocese case; (5) performed research; (6) reviewed and responded to an email from survivor counsel regarding late filed claim issues; (7) reviewed and analyzed issues regarding claims numbers; (8) reviewed and organized abuse claims for review by the Committee; (9) reviewed and analyzed claims valuation issues; (10) reviewed and analyzed issues regarding Chapter 7 trustee's access to proof of claims; (11) reviewed and analyzed motions regarding late-filed claims; (12) reviewed and analyzed issues regarding duplicate claims filed in other bankruptcy proceedings; (13) reviewed and analyzed claim charts and claims regarding survivors who seek allowance of late filed claims; (14) reviewed and analyzed issues regarding standing to bring claim objections; and (15) corresponded and conferred regarding claim issues.

**H. Compensation of Professionals:**  
**21.80 Hours Expended and \$13,997.00 of Fees Incurred**

19. This category relates to services provided by PSZJ with respect to compensation of professionals. During the Compensation Period, PSZJ, among other things: (1) performed work regarding PSZJ's First interim fee application; (2) reviewed and analyzed PSZJ invoices; (3) performed work regarding PSZJ's Second interim fee application; and (4) corresponded and conferred regarding compensation of professionals issues.



**I. Document Production:**  
**16.40 Hours Expended and \$11,070.00 of Fees Incurred**

20. This category relates to services provided by PSZJ with respect to document production issues. During the Compensation Period, PSZJ, among other things: (1) reviewed and analyzed documents; (2) prepared a memorandum regarding reviewed documents; (3) reviewed and organized financial documents and appraisals; and (4) corresponded and conferred regarding document production issues.

**J. Financing:**  
**2.60 Hours Expended and \$1,755.00 of Fees Incurred**

21. This category includes work related to the Debtor's proposed debtor in possession financing and use of cash collateral. During the Compensation Period, PSZJ, reviewed and analyzed PPP loan issues, and corresponded regarding financing issues.

**K. General Creditors Committee:**  
**177.20 Hours Expended and \$119,637.50 of Fee Incurred**

22. This category relates to services provided by PSZJ with respect to Committee issues, including meeting with the Committee in order to provide updates concerning the status of the case and to advise the Committee regarding ongoing matters in the case. During the Compensation Period, PSZJ, among other things: (1) prepared for and participated in meetings on October 4, 16, and 18, 2019 with State Court Counsel, the Committee, and the Debtor's representatives regarding mediation issues; (2) prepared for and attended a Court status conference on December 9, 2019; (3) prepared for and attended a Committee telephonic meeting on December 11, 2019, and responded to inquiries from claimants regarding case status issues; (4) prepared for and participated in a telephonic conference with State Court Counsel on

December 20, 2019 regarding case status issues, including mediation and litigation options; (5) reviewed and analyzed real property and mediation issues; (6) performed work regarding status reports to the Committee; (7) drafted a status conference statement; (8) prepared for and attended a status conference on March 9, 2020; (9) prepared for and attended conference calls with the Committee on March 11 and 16, 2020, with Debtor's counsel on March 26, 2020, and State Court Counsel on March 16 and 25, 2020 regarding case issues including mediation and real property issues; (10) prepared for and participated in a conference call with State Court Counsel on April 10, 2020 regarding real property and insurance issues, and on May 1, 2020 regarding Plan issues and litigation options; (11) reviewed and analyzed New Mexico State Court complaints; (12) reviewed and analyzed preliminary injunction issues; (13) reviewed and analyzed real property discovery issues; (14) reviewed and analyzed bylaw issues; (15) reviewed and analyzed Committee structure issues; (16) reviewed and analyzed property reconciliation issues; (17) prepared for and participated in teleconferences with the Committee on July 8 and 15, 2020 regarding counter offer, real property, insurance, standing litigation and Plan issues; (18) prepared for and participated in teleconferences with State Court Counsel on July 10, 24 and 31, 2020 regarding standing motion, asset sales, and mediation issues; (19) prepared for and attended teleconferences with the Committee on August 5 and 12, 2020 regarding mediation issues; (20) reviewed and analyzed standing litigation and property sale issues; (21) prepared for and attended a telephonic conference with State Court Counsel on August 21, 2020 regarding real estate issues, mediation status, standing motion and Plan concepts; (22) reviewed and analyzed issues regarding a motion for abandonment; (23) prepared for and attended a telephonic

meeting with State Court Counsel on October 2, 2020 regarding mediation and asset sale issues;

(24) prepared for and attended telephonic meetings with the Committee on October 14, 2020 and with State Court Counsel on October 16, 2020 regarding case issues and Court ruling;

(25) prepared for and attended a telephonic meeting with the Committee regarding next steps after avoidance actions; (26) prepared for and attended a telephonic meeting with State Court Counsel on October 23, 2020 regarding mediation, avoidance actions and case strategy;

(27) reviewed and analyzed appellate issues; (28) prepared for and attended a telephonic meeting with State Court Counsel on October 30, 2020 regarding case strategy and real property analysis issues; (29) prepared for and attended telephonic conferences with the Committee on November 4 and 13, 2020 and with State Court Counsel on November 6, 2020 regarding mediation issues;

(30) prepared for and attended a telephonic conference with the Committee on November 18, 2020 regarding mediation options and possible settlement offers; (31) prepared for and attended a telephonic meeting with State Court Counsel on December 4, 2020 regarding asset values and case issues; (32) prepared for and attended telephonic meetings on December 4, 2020 with the Committee and on December 11, 2020 with State Court Counsel regarding mediation issues;

(33) prepared for and attended telephonic conferences with the Committee on December 16, 2020 and with State Court Counsel on December 18, 2020 regarding response to Debtor's mediation offer; (34) prepared for and attended a hearing on December 21, 2020 regarding chapter 7 trustee claims in chapter 11 case; (35) prepared for and participated in meetings with State Court Counsel and the Committee on January 5 and 6, 2021 regarding case status issues;

(36) reviewed and analyzed settlement offer issues; (37) reviewed and analyzed insurance issues;

(38) prepared for and attended telephonic conferences with the Committee and State Court Counsel on January 15, 2021 regarding mediation issues; (39) reviewed and analyzed bar date and discovery issues; (40) performed work regarding a memorandum in preparation for Committee meeting; (41) attended to media issues; (42) prepared for and attended a telephonic conference with the Committee on February 10, 2021 regarding the Debtor's counteroffer; (43) prepared for and attended a telephonic meeting with the Committee on February 24, 2021 regarding offer status and in camera hearing issues; (44) performed work regarding status memorandums to the Committee; (45) prepared for and attended a telephonic meeting with the State Court Counsel on March 15, 2021; (46) prepared for and attended a telephonic meeting with State Court Counsel on April 2, 2021 regarding insurance issues and case status; (47) reviewed and analyzed issues regarding a Future Claims Representative; (48) reviewed and analyzed statute of limitations issues; (49) prepared for and attended a telephonic conference with the Committee on April 14, 2021 regarding insurance mediation issues; (50) prepared for and attended telephonic conferences with State Court Counsel on April 16 and 23, 2021 regarding mediation issues; (51) responded to creditor inquiries regarding case status; (52) prepared for attended a telephonic conference with the Committee on May 5, 2021 regarding real property sales and insurance mediation issues; (53) prepared for and attended a telephonic hearing with State Court Counsel on May 7, 2021 regarding arbitration and stay relief issues; (54) prepared for and attended a telephonic hearing on May 21, 2021 with State Court Counsel regarding arbitration and Plan alternatives; (55) prepared for and attended a telephonic conference with the Committee on May 26, 2021 regarding arbitration and Plan issues;

(56) prepared for and attended a telephonic conference with State Court Counsel on May 28, 2021 regarding arbitrator selection issues; (57) prepared for and attended a telephonic conference on June 11, 2021 with the Committee regarding arbitration issues; (58) prepared for and attended a telephonic conference with State Court Counsel on June 18, 2021 regarding arbitration, property sale status, and Chapter 7 trustee issues; (59) prepared for and attended a telephonic conference on July 9, 2021 with State Court Counsel regarding case strategy related to chapter 7 cases; (60) prepared for and attended a telephonic conference on July 23, 2021 with State Court Counsel regarding arbitration motion; (61) prepared for and attended a telephonic conference with State Court Counsel on August 23, 2021 regarding chapter 7 issues; (62) prepared for and attended a telephonic conference on September 24, 2021 with State Court Counsel regarding case status issues; (63) prepared for and attended telephonic conferences with the Committee on October 15, 2021 regarding arbitration and plan issues and on October 20, 2021 regarding late-filed claim issues; (64) performed work regarding meeting agendas; (65) prepared for and attended telephonic conferences with State Court Counsel on October 22 and 26, 2021 regarding case issues; (66) prepared for and attended a telephonic conference with the Committee on October 26, 2021 regarding mediation and dismissal order issues; and (67) conferred and corresponded regarding General Committee issues.

**L. Hearing:**  
**18.70 Hours Expended and \$12,622.50 of Fees Incurred**

23. This category relates to services provided by PSZJ with respect to preparing for and attending hearings before this Court. During the Compensation Period, PSZJ, among other things: (1) prepared for and attended Omnibus hearings on June 8 and 29, 2020;

(2) prepared for and attended a preliminary hearing on July 23, 2020 and a hearing on August 28, 2020 regarding the standing motion; (3) prepared for and attended an Omnibus hearing on December 7, 2020; (4) prepared for and attended a hearing on January 26, 2021 regarding motion issues; (5) prepared for and attended a status conference on March 8, 2021 regarding adversary proceeding issues; (6) prepared for and attended a telephonic status conference on June 25, 2021 regarding Chapter 7 trustee issues; (7) prepared for and attended a hearing on August 23, 2021 regarding stay relief and motion to seal; (8) prepared for and attended a hearing on August 30, 2021 regarding form of order on motion to seal; and (9) prepared for and attended a hearing on October 24, 2021 regarding the motion to compel arbitration.

**M. Insurance Coverage:**  
**295.20 Hours Expended and \$198,800.00 of Fees Incurred**

24. This category relates to services provided by PSZJ with respect to insurance coverage available to the Debtor.<sup>2</sup> During the Compensation Period, PSZJ, among other things: (1) reviewed and analyzed insurance charts and sent questions to State Court Counsel and to the Debtor regarding insurance-related issues; (2) reviewed and analyzed a Franciscans insurance structure chart; (3) prepared for a telephonic conference and met with the mediator on August 29, 2019; (4) reviewed and analyzed mediation procedures issues; (5) reviewed and analyzed bad faith issues, including bad faith theory as related to the number of claimants and offer; (6) performed work regarding settlement negotiations; (7) reviewed and analyzed anti-assignment issues; (8) reviewed and analyzed Franciscan policies; (9) prepared for and attended a mediation and meetings with the Committee and State Court Counsel on

---

<sup>2</sup> This category includes a small amount of time billed in the Interviews category.

November 18 and 19, 2019; (10) reviewed and analyzed insurance documents; (11) reviewed and analyzed questions from insurers; (12) reviewed and analyzed mediation issues; (13) reviewed and analyzed issues regarding the status of insurance post mediation; (14) reviewed and analyzed issues regarding severity charts; (15) performed work regarding insurer interrogatories; (16) prepared for mediation by reviewing insurance charts and coverage information; (17) reviewed and analyzed audit issues; (18) performed work regarding the insurance section of a status report; (19) reviewed and analyzed draft pleadings from the Debtor's counsel; (20) reviewed and analyzed arbitration issues, and prepared for and attended a telephonic conference with Debtor's counsel on April 2, 2020 regarding insurance issues; (21) reviewed and analyzed a coverage chart against a claims chart and assessed limits of loss on an insurer by insurer basis; (22) prepared for and participated in a telephonic conference on April 24, 2020 with State Court Counsel regarding insurance-related Plan issues; (23) reviewed and analyzed insurer exposure issues; (24) reviewed and analyzed Plan options and strategy; (25) reviewed and analyzed issues regarding assignability of rights and judgments; (26) reviewed and analyzed reinsurance issues; (27) performed work regarding a memorandum concerning Plan options; (28) reviewed and analyzed negotiation issues relating to insurance; (29) reviewed and analyzed a proposed counter offer and the need to recalculate maximum limits and application of ratios; (30) performed work regarding a maximum limits analysis; (31) reviewed and analyzed issues regarding enforcing arbitration; (32) reviewed and analyzed issues regarding CM pool documentation; (33) reviewed and analyzed issues regarding TNCRRG financials; (34) reviewed and analyzed ratio offer issues; (35) reviewed and analyzed settlement hypotheticals;

(36) reviewed and analyzed issues regarding policy counts and coverage, perpetrator and survivor charts; (37) performed work regarding an insurance and claims analysis; (38) reviewed and analyzed issues regarding Plan treatment of unsettled insurance claims; (39) reviewed and analyzed settlement agreements; (40) reviewed and analyzed a dilution exhibit from mediation; (41) reviewed and analyzed first encounter agreements; (42) reviewed and analyzed a master occurrence chart; (43) reviewed and analyzed issues regarding additional information needed and performed work on a request to the Debtor; (44) prepared for and attended telephonic conferences with State Court Counsel and the Committee on January 5 and 6, 2021 regarding settlement strategy issues; (45) reviewed and analyzed mediation demand issues; (46) performed work regarding insurance charts; (47) performed work regarding insurance-related issues relating to a status report; (48) reviewed and analyzed insurance information provided by the Debtor; (49) reviewed and analyzed a memorandum regarding settlement ratios; (50) reviewed and analyzed mediation strategy issues; (51) reviewed and analyzed insurance coverage issues; (52) prepared for and participated in a telephonic conference with mediator and the Committee on January 21, 2021 regarding Debtor offer; (53) reviewed and analyzed scope of settlement issues; (54) prepared for and attended a status conference on January 26, 2021; (55) prepared for and attended a telephonic conference with State Court Counsel on February 9, 2021 regarding insurance issues; (56) reviewed and analyzed claim count issues; (57) reviewed and analyzed a claim demand strategy; (58) reviewed and analyzed in camera hearing issues; (59) performed work regarding a brief for in camera hearing; (60) reviewed and analyzed anti-assignment issues relating to settlement agreements; (61) prepared for and attended a telephonic conference with



State Court Counsel on February 15, 2021 regarding in camera hearing and insurance issues; (62) reviewed and analyzed settlement timing issues; (63) performed work regarding a letter to Judge Thuma; (64) reviewed and analyzed arbitration jurisdiction issues; (65) prepared for and attended a telephonic conference with State Court Counsel regarding status of in camera hearing; (66) performed work regarding a coverage chart; (67) prepared for and attended an in camera hearing on February 22, 2021; (68) attended to mediation timing issues; (69) prepared for and attended a telephonic conference with State Court Counsel on March 20, 2021; (70) reviewed and analyzed buyback issues; (71) prepared for and attended a telephonic conference with State Court Counsel on April 1, 2021 regarding buyback issues; (72) prepared for and attended a telephonic conference with State Court Counsel on April 16, 2021 regarding mediation issues; (73) reviewed and analyzed mediation progress issues; (74) performed work regarding a scoring chart; (75) reviewed and analyzed insurance arbitration issues; (76) prepared for and attended a telephonic conference with State Court Counsel on May 21, 2021 regarding arbitration demand issues; (77) reviewed and analyzed issues regarding arbitration progress; (78) reviewed and analyzed arbitration demands, and prepared for and attended a telephonic conference with State Court Counsel on June 11, 2021 regarding arbitration demand issues; (79) reviewed and analyzed consolidation issues; (80) performed work regarding arbitrator selection; (81) reviewed and analyzed issues regarding form of order relating to sealing motion; (82) reviewed and analyzed invoices of Blank Rome regarding insurance issues; and (83) conferred and corresponded regarding insurance issues.

**N.     Litigation (Non-Bankruptcy):**  
**0.30 Hours Expended and \$202.50 of Fees Incurred**

25.     Services in this category relate to issues regarding litigation in non-Bankruptcy Courts. During the Compensation Period, PSZJ, among other things, reviewed and analyzed litigation options in light of a mediation impasse.

**O.     Mediation:**  
**65.20 Hours Expended and \$43,605.00 of Fees Incurred**

26.     Services in this category relate to PSZJ's preparation for and attendance at mediation sessions, and related mediation issues. During the Compensation Period, PSZJ, among other things: (1) reviewed and analyzed the status of mediation; (2) reviewed and analyzed mediation due diligence issues; (3) reviewed and analyzed the Debtor response to Committee counter-offer; (4) reviewed and analyzed statute of limitations issues; (5) prepared for and attended a telephonic conference with State Court Counsel on August 7, 2020 regarding mediation strategy issues; (6) prepared for and attended a teleconference on August 11, 2020 regarding pre-mediation issues; (7) prepared for and attended a telephonic conference with State Court Counsel on August 14, 2020 regarding real property and mediation strategies; (8) prepared for and attended a mediation session on August 17, 2020; (9) prepared for and attended a telephonic conference with State Court Counsel on August 22, 2020 regarding mediation issues; (10) reviewed and analyzed a Debtor's mediation offer and issues regarding timing of offer; (11) prepared for and attended a mediation on November 30, 2020; (12) drafted bullet points for mediator regarding settlements and dilution; (13) prepared for and attended a telephonic conference on January 6, 2021 with State Court Counsel regarding mediation strategy issues; (14) prepared for and attended a telephonic conference on January 6, 2021 with the Committee

regarding mediation and case status issues; (15) prepared for and attended a telephonic conference with State Court Counsel on January 13, 2021 regarding an insurance memorandum; (16) prepared for and attended a meeting with the mediator on January 15, 2021 regarding case status issues; (17) prepared for and attended a telephonic conference with the Committee and the mediator on January 19, 2021; (18) drafted a demand letter to the Debtor; (19) prepared for and conferred telephonically with the mediator regarding the status of discussions with the Debtor; (20) prepared for and conferred telephonically with State Court Counsel on February 9, 2021 regarding the Debtor's rejection of offer; (21) drafted a settlement letter to the Debtor; (22) prepared for and attended a Zoom call with the mediator and State Court Counsel on March 20, 2021; (23) reviewed and analyzed settlement letters to insurers from the Debtor and analyzed settlement demands; (24) prepared for and attended telephonic conferences with State Court Counsel on April 16 and 23, 2021 regarding mediation issues; (25) reviewed and analyzed Plan and settlement issues; (26) conferred with the mediator on May 5 and 11, 2021 regarding the status of insurance mediation; (27) reviewed and analyzed the Mallott report regarding mediation issues; and (28) conferred and corresponded regarding mediation issues.

**P. Outgoing Claims Analysis:**  
**597.50 Hours Expended and \$394,140.00 of Fees Incurred**

27. Services in this category relate to outgoing claims analysis issues. During the Compensation Period, PSZJ, among other things: (1) reviewed and analyzed issues regarding discovery responses; (2) reviewed and analyzed documents; (3) reviewed and analyzed fraudulent transfer issues; (4) reviewed and analyzed alter ego issues; (5) performed work regarding standing motions; (6) reviewed and analyzed theories of liability for transfers to the

Deposit and Loan Fund (“DLF”) and Real Estate Trust; (7) reviewed and analyzed a Section 341 creditors’ meeting transcript and documents regarding an analysis of outgoing claims;

(8) reviewed, analyzed and organized documents from second and third document productions;

(9) reviewed and analyzed trust theory issues; (10) reviewed and analyzed the Debtor’s claims that assets are not property of the estate; (11) reviewed and analyzed The Catholic Foundation documents; (12) reviewed and analyzed issues regarding Debtor assets and property allegedly held in trust as assets of the estate; (13) reviewed and analyzed issues regarding resulting trusts;

(14) reviewed and analyzed the transcript of the deposition of John Huchmala; (15) reviewed and analyzed tracing analysis issues; (16) reviewed and analyzed Parish incorporation documents and prepared a chronology; (17) reviewed and analyzed Schedules and deeds regarding properties held by the Debtor; (18) reviewed and analyzed financial statements and documents regarding estate claims concerning the Real Estate Trust and DLF; (19) reviewed and analyzed Debtor reports and financials regarding the timeline of financial problems; (20) performed work regarding a memorandum relating to restructuring; (21) performed work regarding a memorandum relating to fraudulent transfer recovery issues; (22) reviewed and analyzed bank transfers; (23) performed work regarding a memorandum relating to fraudulent transfer and alter ego issues; (24) reviewed and analyzed claims against the DLF and the Real Estate Trust;

(25) performed work regarding a memorandum concerning assets of The Catholic Foundation and evaluated potential claims to recover property of the estate from The Catholic Foundation;

(26) reviewed and analyzed New Mexico State Law regarding unincorporated associations;

(27) reviewed and analyzed issues regarding an expanded reach-back period for fraudulent

transfers when an IRS claim exists; (28) reviewed and analyzed issues regarding filing requirements for unincorporated associations; (29) reviewed and analyzed litigation strategy issues regarding avoidance actions; (30) performed work regarding a transfer memorandum; (31) reviewed and analyzed Section 544(b) and statutes of limitations issues; (32) attended to evidentiary proof issues; (33) reviewed and analyzed mixed intent issues; (34) performed work regarding a critical document chronology; (35) reviewed and analyzed deeds; (36) reviewed and analyzed RFRA issues; (37) reviewed and analyzed potential confirmation issues; (38) reviewed and analyzed issues regarding standing motions; (39) reviewed and analyzed derivative standing issues and standards; (40) reviewed and analyzed New Mexico law regarding UFTA statutes of limitations; (41) reviewed and analyzed inquiry notice issues under New Mexico law regarding fraud; (42) performed work regarding a fraudulent transfer complaint against the Real Estate Trust; (43) performed work relating to statute of limitations and colorable claims issues regarding a standing motion; (44) performed work regarding standing demand letters; (45) reviewed and analyzed issues regarding unjustified refusal to pursue litigation; (46) performed work regarding complaints to avoid unrecorded interests in real property, avoid transfers to the Real Estate Trust and challenge the Self-Settled Trust, including complaints against the DLF Trust and the Real Estate Trust; (47) performed work regarding exhibits relating to trust transfers; (48) performed work regarding a tracking chart of transferred properties; (49) reviewed and analyzed issues regarding property values and performed work regarding a spreadsheet of values; (50) reviewed and analyzed the Debtor's response to a standing demand letter; (51) reviewed and revised a standing motion, including arguments related to self-settled

trusts and factual background; (52) performed work regarding an avoidance complaint relating to the Real Estate Trust; (53) reviewed and analyzed triggering creditor issues; (54) reviewed and analyzed issues regarding third party releases; (55) reviewed and analyzed issues regarding discovery and statute of repose; (56) reviewed and analyzed documents relating to the DLF Trust; (57) reviewed and analyzed Debtor financials relating to DLF income and identification of assets; (58) reviewed and analyzed deeds produced by the Debtor and compared them to schedules relating to transfers to the Real Estate Trust and the DLF Trust; (59) performed work regarding the declaration of Ken Brown in support of standing motion; (60) performed work regarding a non-disclosure agreement; (61) reviewed and analyzed a State Court complaint regarding triggering creditor issues; (62) attended to scheduling issues; (63) attended to time extension issues; (64) performed work regarding a briefing schedule stipulation; (65) reviewed and analyzed the Debtor's opposition to standing motion and performed work regarding a reply; and (66) conferred and corresponded regarding outgoing claims issues.

**Q. Plan and Disclosure Statement:**  
**277.30 Hours Expended and \$186,615.00 of Fees Incurred**

28. This category relates to services provided by PSZJ with respect to Plan of Reorganization ("Plan") and Disclosure Statement issues, including work with respect to mediation issues. During the Compensation Period, PSZJ, among other things: (1) reviewed and analyzed a State Court Counsel statement to mediator; (2) prepared for and participated in a teleconference on October 7, 2019 with the mediator and the Debtor's counsel regarding insurance coverage and religious orders; (3) reviewed and analyzed Congregation and Peraclete insurance issues; (4) drafted a confidentiality agreement for religious order due diligence;

(5) reviewed and analyzed claims and insurance issues in preparation for mediation; (6) attended to mediation scheduling issues; (7) reviewed and analyzed a mediation offer; (8) performed work regarding a counteroffer; (9) prepared for and attended mediation sessions on November 18 and 19, 2019; (10) met with State Court Counsel on November 19, 2019 regarding the next steps in mediation; (11) reviewed and analyzed the mediator's position regarding real estate issues; (12) monitored the status of document production; (13) reviewed and analyzed interrogatories from the Debtor; (14) attended to privilege issues; (15) performed work regarding document production issues; (16) reviewed and analyzed third party release issues; (17) reviewed and analyzed issues regarding underutilization of assets; (18) prepared for and participated in a telephonic conference with State Court Counsel on December 12, 2019 regarding mediation and property issues; (19) performed work regarding interrogatory objections; (20) performed work regarding a letter to the Debtor; (21) performed work regarding responses to interrogatories; (22) performed work regarding mediation issues; (23) reviewed and analyzed mediation alternatives; (24) reviewed and analyzed issues regarding alleged mission critical property; (25) conferred with State Court Counsel regarding confirmation standards and procedures; (26) attended to proof of claim form issues relating to mediation; (27) reviewed and analyzed a mediation and settlement analysis; (28) reviewed and analyzed a claims sheet in preparation for mediation; (29) prepared for and participated in a conference call with the mediator on January 21, 2020 regarding upcoming insurance discussions; (30) prepared for and participated in a teleconference with State Court Counsel on January 24, 2020 and with the Committee on January 30, 2020 regarding mediation issues; (31) reviewed and analyzed cramdown and best

interests of creditors test issues; (32) performed work regarding negotiations with the Debtor and insurers; (33) reviewed and analyzed Plan-related RFRA issues and performed work regarding a memorandum; (34) reviewed and analyzed a claims chart in preparation for mediation; (35) reviewed and analyzed issues regarding the Cemetery Association, The Catholic Foundation and Spendthrift Trusts and reviewed and analyzed appraisals for the St. Pius School, and Chancery and Retreat Center; (36) prepared for and attended a mediation session on February 3, 2020; (37) met with State Court Counsel post-mediation; (38) reviewed and analyzed documents produced by the Cemetery Association; (39) performed work regarding a post-mediation letter to the Debtor; (40) performed work regarding a memorandum relating to the best interests of creditors test and RFRA; (41) performed research regarding revocable and irrevocable trust issues; (42) prepared for and participated in telephonic conferences with State Court Counsel on February 28, 2020 regarding mediation issues; (43) reviewed and analyzed issues regarding a potential mediator candidate; (44) performed work regarding a stipulated mediation order; (45) reviewed and analyzed insurance issues for mediation; (46) prepared for and participated in a teleconference on April 21, 2020 with State Court Counsel, the mediator and representatives of the Debtor; (47) prepared for and attended a telephonic conference with the Committee on April 22, 2020 and with State Court Counsel on April 24, 2020 regarding mediation issues; (48) reviewed and analyzed a settlement agreement and coverage chart regarding Plan options; (49) performed work regarding mediation strategy issues; (50) reviewed and analyzed gifting issues; (51) reviewed and analyzed Plan structure issues, and attended to issues regarding a liquidation analysis; (52) reviewed and analyzed arbitration clauses in insurance settlement



agreements; (53) performed work regarding a settlement offer; (54) reviewed and analyzed a mediation counteroffer and strategy issues; (55) reviewed and analyzed insurance coverage charts and the need to update them; (56) reviewed and analyzed assumptions related to counteroffer; (57) reviewed and analyzed the Debtor's counter-offer regarding real property issues; (58) prepared for and attended a teleconference with the Committee on July 29, 2020 regarding counter-offer and mediation issues; (59) reviewed and analyzed issues regarding the best interests test and RFRA; (60) prepared for and attended a meeting with State Court Counsel regarding counter-offer issues; (61) prepared for and attended a Committee meeting on December 9, 2020 regarding counter-offer to the Debtor; (62) reviewed and responded to Debtor's rejection of Committee's offer; (63) prepared for and attended a telephonic conference with Debtor counsel on December 21, 2020 regarding settlement issues; (64) reviewed and analyzed insurance strategy and coverage issues; (65) prepared for and attended a telephonic conference with State Court Counsel on January 6, 2021 regarding a response to the Debtor's counteroffer; (66) reviewed and analyzed the Debtor's response to counteroffer; (67) reviewed and analyzed mediation and insurance issues; (68) reviewed and analyzed religious order issues; (69) reviewed and analyzed the impact of insurance mediation on avoidance adversary proceedings; (70) reviewed and analyzed insurance neutral Plan issues; (71) reviewed and analyzed arbitration issues; (72) prepared for and attended a telephonic conference with State Court Counsel on May 14, 2021 regarding arbitration issues; (73) reviewed and analyzed confidentiality issues relating to insurers; (74) prepared for and attended a telephonic conference

on October 8, 2021 with State Court Counsel regarding plan related options; and (75) conferred and corresponded regarding Plan and Disclosure Statement issues.

**R. PSZ&J Compensation:**  
**13.00 Hours Expended and \$5,751.00 of Fees Incurred**

29. Services in this category relate to work regarding the Firm's fee applications. During the Compensation Period, the Firm, among other things, performed work regarding its First Interim fee application, including the preparation of exhibits.

**S. Retention of Professionals:**  
**10.10 Hours Expended and \$6,817.50 of Fees Incurred**

30. This category relates to services provided by PSZJ with respect to retention of professionals for the Debtor and the Committee. During the Compensation Period, PSZJ specifically provided the following services, among others, related to this category: (1) drafted applications to employ real estate appraisers; (2) performed work regarding a supplemental declaration in support of PSZJ's retention; (3) reviewed and analyzed an accountant retention application and performed work regarding an objection to such application; and (4) corresponded regarding retention issues.

**T. Retention of Professionals/Others:**  
**4.80 Hours Expended and \$3,240.00 of Fees Incurred**

31. This category relates to the retention of professionals, other than PSZJ. During the Compensation Period, PSZJ, among other things: (1) conferred with prospective appraisers regarding Santa Fe, New Mexico properties; (2) reviewed and analyzed appraisal issues; (3) reviewed and analyzed an appraisal proposal; (4) reviewed and analyzed issues

regarding the payment of invoices; (5) reviewed and analyzed brokers' employment applications and (6) performed work regarding an objection to proposed accountant retention.

**U. Stay Litigation:**

**7.60 Hours Expended and \$5,130.00 of Fees Incurred**

32. This category relates to services provided by PSZJ with respect to the automatic stay and relief from stay motions. During the Compensation Period, PSZJ among other things: (1) reviewed and analyzed issues regarding stay and relief from stay issues related to third party co-defendants; (2) reviewed and analyzed an OSC re contempt; (3) reviewed and analyzed a motion to extend the Section 362 stay; (4) reviewed and analyzed issues regarding the effect of stay on LaSalle cases; (5) reviewed and analyzed stay relief strategy issues; (6) reviewed and analyzed pleadings regarding a relief from stay motion by creditor on defamation action; and (7) conferred and corresponded regarding relief from stay issues.

**V. Travel:**

**70.00 Hours Expended and \$23,625.00 of Fees Incurred**

33. During the Compensation Period, PSZJ, incurred non-working time while traveling on case matters. Time billed in this category is charged at 50% of PSZJ's normal rates.

**SUMMARY OF EXPENSES INCURRED**

34. PSZJ also requests approval and reimbursement of expenses it expended during the Compensation Period in the amount of \$39,353.58, as set forth in the summary attached as **Exhibit D** to this Application. PSZJ notes that these expenses are customary charges made to other PSZJ clients in the ordinary course of its billing practice.

**PSZJ'S FEES AND EXPENSES SHOULD  
BE AWARDED UNDER APPLICABLE LAW**

35. The fees and expenses PSZJ requests by this Application are an appropriate award for its services as counsel to the Committee.

**B. Factors Used to Evaluate Requests for Compensation**

36. Pursuant to section 330 of the Bankruptcy Code, the Court may award to a professional person “reasonable compensation for actual, necessary services rendered” and “reimbursement for actual, necessary expenses” the professional incurred. *See* 11 U.S.C. § 330(a)(1)(A)-(B). As set forth above and in the exhibits to this Application, the fees for which PSZJ requests compensation and the expenses PSZJ incurred for which it seeks reimbursement are for actual and necessary services and expenses incurred during the Compensation Period.

37. The professional services PSZJ rendered have required time and effort. During the Compensation Period, professionals and paraprofessionals at PSZJ recorded 2,803.10 hours at a reduced hourly rate capped at \$675.00. PSZJ’s blended hourly rate for the Compensation Period including paraprofessionals is \$658.95; PSZJ’s blended hourly rate for the Compensation Period excluding paraprofessionals is \$664.69.

38. Time and labor devoted is only one of many pertinent factors in determining an award of fees and costs. Based on the skills brought to bear in this case, the results obtained, and the accepted lodestar approach discussed below, PSZJ submits that the compensation it requests by this Application is reasonable and appropriate.

**C. The Lodestar Award Should be Calculated by  
Multiplying a Reasonable Hourly Rate by the Hours Worked**

39. In the Tenth Circuit, “the adjusted lodestar approach is used to calculate reasonable attorney’s fees under 11 U.S.C. § 330(a).” *Market Center East Retail Property, Inc. v. Lurie (In re Market Center East Retail Property, Inc.)*, 730 F.3d 1239, 1246 (10th Cir. 2013). *Blum vs. Stenson*, 465 U.S. 886 (1984), defined the so-called lodestar calculation:

The initial estimate of a reasonable attorney’s fee is properly calculated by multiplying the number of hours reasonably expended on the [matter] times a reasonable hourly rate.

*Id.* at 888.

40. The lodestar factors that determine the reasonableness of fees include the items listed in section 330(a)(3) of the Bankruptcy Code and the 12 factors set forth in *Johnson v. Georgia Highway Express, Inc.* 488 F.2d 714 (5<sup>th</sup> Cir. 1974). *See Market Center*, 730 F.3d at 1246. Section 330(a)(3) provides that the amount of reasonable compensation to be awarded to a professional shall include “the nature, the extent, and the value of such services, taking into account” the following relevant factors: (1) the time spent on the services; (2) the rates charged; (3) whether the services were necessary or beneficial at the time they were rendered; (4) whether the services were performed within a reasonable amount of time “commensurate with the complexity, importance, and nature of the problem, issue, or task;” (5) the professionals’ demonstrated skill and experience in the bankruptcy field; and (6) whether the compensation is reasonable “based on the customary compensation charged by comparably skilled practitioners in cases other than cases” under title 11. 11 U.S.C. § 330(a)(3)(A)-(F). The *Johnson* factors are as follows: (1) the time and labor required in the case; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the service properly; (4) the preclusion of other employment due to acceptance of this case; (5) the customary fee; (6) whether the fee is fixed or

contingent; (7) time limitations imposed by the client or circumstances; (8) the amount of money involved and results obtained; (9) the experience, reputation, and ability of the attorneys; (10) the “undesirability” of the case; (11) the nature and length of the attorneys’ professional relationship with the client; and (12) awards in similar cases.” *Market Center*, 730 F.3d at 1247 (quoting *Johnson*, 488 F.3d at 717-19).

41. Under the factors set forth in section 330(a)(3) and *Johnson*, PSZJ’s fees in this Application are reasonable. As discussed above, PSZJ’s rates in this case are capped below PSZJ’s standard hourly rates for similar cases. The PSZJ attorneys with principal responsibility for this representation have vast experience representing committee’s in bankruptcy cases filed by entities that are part of the Roman Catholic Church, such as the Debtor. As such, PSZJ brings unparalleled experience to these cases and is able to address matters efficiently based on its attorneys’ knowledge of the workings and organizational structures of Roman Catholic dioceses in the United States. PSZJ provided a benefit to the estate through the services described above, all of which were necessary to provide a reasonable process for sexual abuse survivors to assert confidential claims against the Debtor, and for PSZJ to analyze the claims filed, analyze assets (including insurance, real property and property in which the Debtor may have an interest) available to pay claimants, and prepare for mediation of a global settlement of sexual abuse claims against the Debtor to be memorialized in a plan of reorganization. All matters were undertaken in an effort to maximize value for creditors and in an efficient manner.

42. WHEREFORE, PSZJ prays that this Court enter an Order (1) allowing interim compensation to PSZJ for fees and costs incurred during the Compensation Period in the total amount of \$1,423,735.83, which amount is comprised of fees in the amount of

\$1,384,382.25 and expenses in the amount of \$39,353.58; (2) directing the Debtor to pay PSZJ the interim amount of \$1,423,735.83, comprising \$1,384,382.25 (75% of allowed fees) and \$39,353.58 (100% of allowed expenses) less amounts paid for the Compensation Period (\$1,072,379.81) on an interim basis for a total additional interim payment of \$351,356.02. and (3) granting such other and further relief as the Court deems just and proper.

Dated: January 5, 2022

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES LLP

By /s/James I. Stang

James I. Stang  
10100 Santa Monica Blvd., 13th Floor  
Los Angeles, CA 90067  
Tel: 310-277-6910  
Fax: 310-201-0760  
jstang@pszjlaw.com

- and -

Ilan D. Scharf  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, NY 10017  
Tel: 212-561-7721  
Fax: 212-561-7777  
ischarf@pszjlaw.com

Counsel for the Official Committee of  
Unsecured Creditors

EXHIBIT A  
(Summary of Fees by Professional)



SUMMARY OF TIME CHARGES AND HOURLY RATES  
BY PROFESSIONAL AND PARAPROFESSIONAL

Professional's Name	Title	Year Admitted	Rate	Hours	Fees
Issac M. Pachulski	Partner	1974	\$ 675.00	1.10	\$ 742.50
James I. Stang	Partner	1980	\$ 675.00	389.70	\$263,047.50
James I. Stang	Partner	1980	\$ 337.50	24.00	\$ 8,100.00
Kenneth H. Brown	Partner	1981	\$ 675.00	538.70	\$363,622.50
Iain A.W. Nasatir	Partner	1983	\$ 675.00	316.30	\$213,502.50
Iain A.W. Nasatir	Partner	1983	\$ 337.50	8.00	\$ 2,700.00
Stanley E. Goldrich	Partner	1984	\$675.00 <sup>3</sup>	0.40	\$ 270.00
Ilan D. Scharf	Partner	2002	\$ 675.00	281.10	\$189,742.50
Ilan D. Scharf	Partner	2002	\$ 337.50	38.00	\$ 12,825.00
Gabriel I. Glazer	Partner	2006	\$ 675.00	22.50	\$ 15,187.50
Robert M. Saunders	Of Counsel	1984	\$ 675.00	11.70	\$ 7,897.50
Harry D. Hochman	Of Counsel	1987	\$ 675.00	51.20	\$ 34,560.00
William L. Ramseyer	Of Counsel	1989	\$675.00 <sup>4</sup>	11.30	\$ 7,627.50
Erin E. Gray	Of Counsel	1992	\$ 675.00	10.00	\$ 6,750.00
Gail S. Greenwood	Of Counsel	1994	\$ 675.00	879.10	\$593,392.50
Victoria A. Newmark	Of Counsel	1996	\$ 675.00	5.90	\$ 3,982.50
Gillian N. Brown	Of Counsel	1999	\$ 675.00	2.40	\$ 1,620.00
Cia H. Mackle	Of Counsel	2007	\$ 675.00	17.50	\$ 11,812.50
Cia H. Mackle	Of Counsel	2007	\$ 337.00	3.10	\$ 2,015.00
Peter J. Keane	Of Counsel	2008	\$ 675.00	11.70	\$ 7,897.50
Steven W. Golden	Associate	2015	\$ 625.00	110.40	\$ 69,000.00
Steven W. Golden	Associate	2015	\$ 575.00	2.50	\$ 1,437.50
Leslie A. Forrester	Law Library Director		\$ 475.00	20.40	\$ 9,405.00
Leslie A. Forrester	Law Library Director		\$ 450.00	2.00	\$ 950.00
Patricia J. Jeffries	Paralegal		\$ 425.00	11.20	\$ 4,760.00
La Asia S. Canty	Paralegal		\$ 425.00	10.80	\$ 4,266.00
Cheryl A. Knotts	Paralegal		\$ 395.00	6.60	\$ 2,607.00
Diane H. Hinojosa	Legal Assistant		\$ 395.00	12.00	\$ 4,740.00
Sophia L. Lee	Legal Assistant		\$ 395.00	3.50	\$ 1,382.50
<b>TOTAL:</b>				<b>2,803.10</b>	<b>\$1,845,843.00</b>

<sup>3</sup> The rate originally billed was \$1,025; but was reduced to \$675 in this Second Interim Fee Application.

<sup>4</sup> The rate originally billed was \$775; but was reduced to \$675 in this Second Interim Fee Application.

EXHIBIT B  
(PSZJ Bills)

# **Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

October 31, 2019

Invoice 124730

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

## **STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 10/31/2019**

FEES	\$44,688.50
EXPENSES	\$685.56
<b>TOTAL CURRENT CHARGES</b>	<b>\$45,374.06</b>
<b>BALANCE FORWARD</b>	<b>\$413,032.54</b>
<b>LAST PAYMENT</b>	<b>\$265,649.13</b>
<b>TOTAL BALANCE DUE</b>	<b>\$192,757.47</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
CHM	Mackle, Cia H.	Counsel	650.00	3.10	\$2,015.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	16.30	\$11,002.50
IDS	Scharf, Ilan D.	Partner	675.00	20.20	\$13,635.00
JIS	Stang, James I.	Partner	675.00	20.40	\$13,770.00
LSC	Canty, La Asia S.	Paralegal	395.00	10.80	\$4,266.00
				<hr/> 70.80	<hr/> \$44,688.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	4.40	\$2,892.50
CA	Case Administration [B110]	0.40	\$270.00
CO	Claims Admin/Objections[B310]	1.50	\$1,012.50
CP	Compensation Prof. [B160]	0.40	\$270.00
GC	General Creditors Comm. [B150]	8.90	\$6,007.50
IC	Insurance Coverage	17.90	\$12,082.50
PC	PSZ&J Compensation	13.00	\$5,751.00
PD	Plan & Disclosure Stmt. [B320]	24.30	\$16,402.50
		70.80	<hr/> \$44,688.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 124730  
October 31, 2019

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Air Fare [E110]	\$359.19
Conference Call [E105]	\$316.17
Postage [E108]	\$0.50
Reproduction/ Scan Copy	\$9.70
	<hr/>
	\$685.56

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
10/04/2019	CHM	AA	Telephone conference with J. Stang re documents produced by Foundation.	0.10	650.00	\$65.00
10/04/2019	CHM	AA	Review documents produced by Catholic Foundation and create spreadsheet identifying donor restricted funds.	3.00	650.00	\$1,950.00
10/30/2019	IDS	AA	Continue analysis of Franciscan claims.	1.30	675.00	\$877.50
				<b>4.40</b>		<b>\$2,892.50</b>
<b>Case Administration [B110]</b>						
10/06/2019	IDS	CA	Attend meeting with SCC regarding mediation process.	0.40	675.00	\$270.00
				<b>0.40</b>		<b>\$270.00</b>
<b>Claims Admin/Objections[B310]</b>						
10/03/2019	JIS	CO	Multiple emails to survivors re ADSF questions on claims.	1.50	675.00	\$1,012.50
				<b>1.50</b>		<b>\$1,012.50</b>
<b>Compensation Prof. [B160]</b>						
10/16/2019	IDS	CP	Email to B. Anderson regarding fees.	0.20	675.00	\$135.00
10/16/2019	IDS	CP	Office conference with LAC regarding fee application.	0.20	675.00	\$135.00
				<b>0.40</b>		<b>\$270.00</b>
<b>General Creditors Comm. [B150]</b>						
10/01/2019	JIS	GC	Email to Committee re status.	0.20	675.00	\$135.00
10/02/2019	JIS	GC	Telephone call with state court counsel regarding insurance charts and asset disposition.	0.50	675.00	\$337.50
10/04/2019	JIS	GC	Conference call with state court counsel re mediation and case status.	0.90	675.00	\$607.50
10/08/2019	JIS	GC	Memo to Committee re status.	0.60	675.00	\$405.00
10/14/2019	JIS	GC	Email to committee regarding meeting for mediation demand.	0.40	675.00	\$270.00
10/16/2019	JIS	GC	Committee call re mediation.	1.40	675.00	\$945.00
10/16/2019	IDS	GC	Attend committee call.	1.40	675.00	\$945.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/17/2019	JIS	GC	Telephone call from survivor re case status.	0.30	675.00	\$202.50
10/18/2019	JIS	GC	Conference call with Debtor's counsel re mediation issues (.8) and telephone call with Ilan Scharf re same (.1).	0.90	675.00	\$607.50
10/25/2019	JIS	GC	State court counsel call.	0.60	675.00	\$405.00
10/30/2019	JIS	GC	Committee call.	0.70	675.00	\$472.50
10/30/2019	IDS	GC	Attend committee call.	0.70	675.00	\$472.50
10/30/2019	IDS	GC	Draft agenda for committee call.	0.30	675.00	\$202.50
				<b>8.90</b>		<b>\$6,007.50</b>

### Insurance Coverage

08/29/2019	IAWN	IC	Prepare for and attend telephone conference with mediator re mediation	1.80	675.00	\$1,215.00
10/01/2019	JIS	IC	Telephone call with Iain Nasatir regarding insurance coverage.	0.50	675.00	\$337.50
10/02/2019	IAWN	IC	Review insurance charts and analyze, review exhaustion chart, draft email to SCC re insurance issues and questions, limits etc., draft and send email to diocese re open insurance questions	3.80	675.00	\$2,565.00
10/02/2019	JIS	IC	Meeting with Iain Nasatir regarding insurance coverage chart (.3) and email to state court counsel regarding charts (.4).	0.70	675.00	\$472.50
10/07/2019	IAWN	IC	Exchange emails with Carter and Warburton re insurance	0.30	675.00	\$202.50
10/09/2019	IAWN	IC	Telephone conference with committee re demand	1.20	675.00	\$810.00
10/09/2019	IAWN	IC	Review Francisans insurance structure chart and analyze	0.50	675.00	\$337.50
10/09/2019	IAWN	IC	Review insurance mediator background	0.10	675.00	\$67.50
10/11/2019	JIS	IC	Meeting with Iain Nasatir regarding order insurance issues (Franciscans and Peraclete).	0.30	675.00	\$202.50
10/15/2019	IAWN	IC	Exchange emails and telephone conferences with Hurley re Franciscans, review emails from Hurley re same	0.80	675.00	\$540.00
10/15/2019	IAWN	IC	Exchange emails with James I Stang and assistant re Confidentiality Agreement	0.10	675.00	\$67.50
10/17/2019	IAWN	IC	Review Franciscan information, analyze against chart, draft email re same to James I Stang	0.80	675.00	\$540.00
10/17/2019	JIS	IC	Telephone call with L. Ford re insurance coverage and email to Iain Nasatir re same.	0.10	675.00	\$67.50



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/18/2019	IAWN	IC	Papas call re insurance, prepare for same	1.40	675.00	\$945.00
10/25/2019	IAWN	IC	Telephone conference with mediator (1.6); preparation for call (.5)	2.10	675.00	\$1,417.50
10/27/2019	IAWN	IC	Exchange emails with Papas re insurance	0.20	675.00	\$135.00
10/28/2019	IAWN	IC	Telephone conference with Hurley re insurance, review email re same	0.50	675.00	\$337.50
10/30/2019	IAWN	IC	Preparation for Papas call, review email and review documents involved	0.80	675.00	\$540.00
10/30/2019	IAWN	IC	Telephone conference with Papas re mediation	1.60	675.00	\$1,080.00
10/30/2019	IAWN	IC	Review Hurley emails re CA	0.20	675.00	\$135.00
10/30/2019	IAWN	IC	Review insurance information on Franciscans	0.10	675.00	\$67.50
				<b>17.90</b>		<b>\$12,082.50</b>

#### **PSZ&J Compensation**

10/18/2019	IDS	PC	Work on fee app	1.40	675.00	\$945.00
10/18/2019	LSC	PC	Begin preparation of interim fee application and exhibits.	6.90	395.00	\$2,725.50
10/23/2019	IDS	PC	Revise fee application.	0.80	675.00	\$540.00
10/23/2019	LSC	PC	Revise exhibits and continued preparation of narrative portion of fee application.	3.90	395.00	\$1,540.50
				<b>13.00</b>		<b>\$5,751.00</b>

#### **Plan & Disclosure Stmt. [B320]**

10/03/2019	JIS	PD	Review SCC statement to mediator.	0.80	675.00	\$540.00
10/07/2019	JIS	PD	Call with mediator and Debtor regarding mediation issues, including insurance coverage, religious orders.	1.50	675.00	\$1,012.50
10/07/2019	IDS	PD	Telephone conference with Debtor's counsel regarding mediation.	0.80	675.00	\$540.00
10/08/2019	JIS	PD	Telephone call to Iain Nasatir regarding insurance issues at mediation.	0.20	675.00	\$135.00
10/11/2019	JIS	PD	Telephone call from Brad Hall re mediation preparation.	0.60	675.00	\$405.00
10/11/2019	JIS	PD	Telephone call with state court counsel re mediation demand.	1.10	675.00	\$742.50
10/11/2019	JIS	PD	Review two emails regarding Congregation and Peraclete insurance and email to J. Jones regarding Peraclete and Congregation insurance.	0.40	675.00	\$270.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/15/2019	JIS	PD	Draft confidentiality agreement for religious order due diligence.	0.80	675.00	\$540.00
10/16/2019	IDS	PD	Prepare for mediation.	1.20	675.00	\$810.00
10/18/2019	JIS	PD	Conference call with state court counsel regarding mediation.	0.80	675.00	\$540.00
10/18/2019	JIS	PD	Email to Jeff Jones re Congregation and Peraclete.	0.20	675.00	\$135.00
10/18/2019	JIS	PD	Draft and revise email to mediator with demand.	0.70	675.00	\$472.50
10/18/2019	JIS	PD	Call with Brad Hall and Levi Monagle re call with Debtor's counsel.	0.50	675.00	\$337.50
10/18/2019	IDS	PD	Call with SCC regarding mediation, property.	0.80	675.00	\$540.00
10/18/2019	IDS	PD	Call with Debtor counsel regarding mediation.	0.80	675.00	\$540.00
10/21/2019	JIS	PD	Draft email to State Court Counsel re call with Judge Papas and Debtor.	0.30	675.00	\$202.50
10/21/2019	JIS	PD	Conference call with Debtor and Judge Papas re mediation.	1.10	675.00	\$742.50
10/22/2019	JIS	PD	Telephone call with mediator.	1.00	675.00	\$675.00
10/22/2019	JIS	PD	Draft email to committee regarding meeting with Bishop at mediation.	0.20	675.00	\$135.00
10/22/2019	JIS	PD	Telephone call with Rothstein Donatelli regarding mediation and discovery.	0.60	675.00	\$405.00
10/25/2019	IDS	PD	Telephone conference with SCC regarding mediation.	0.70	675.00	\$472.50
10/25/2019	IDS	PD	Analysis for mediation (claims and insurance).	2.40	675.00	\$1,620.00
10/28/2019	IDS	PD	Revise Franciscan confi	1.20	675.00	\$810.00
10/28/2019	IDS	PD	Review claims with Franciscan abuser.	4.20	675.00	\$2,835.00
10/28/2019	IDS	PD	Review additional Franciscan comments.	0.40	675.00	\$270.00
10/28/2019	IDS	PD	Further revisions of Franciscan confi.	0.60	675.00	\$405.00
10/29/2019	IDS	PD	Finalize Francisca confi.	0.40	675.00	\$270.00
				<b>24.30</b>		<b>\$16,402.50</b>

**TOTAL SERVICES FOR THIS MATTER:**

**\$44,688.50**

---

**Expenses**

09/06/2019	CC	Conference Call [E105] AT&T Conference Call, IAWN	12.61
09/06/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	41.16
09/06/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	1.08
09/06/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	0.28
09/06/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	4.30
09/17/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	0.08
09/18/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	1.15
09/18/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	0.23
09/18/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	45.38
09/20/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	1.20
09/27/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	1.71
09/27/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	13.25
10/02/2019	PO	05066.00002 :Postage Charges for 10-02-19	0.50
10/04/2019	AF	Air Fare [E110] Southwest, Tkt. 5262127651522, From OAK to ABQ to PHX , R. La Riva	236.98
10/04/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	48.51
10/07/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.08
10/10/2019	AF	Air Fare [E110] Delta Airlines, Tkt. 00674631498166, From	122.21

---

LAX to ABQ, ABQ to LAX, JIS			
10/11/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	79.14
10/18/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	30.16
10/22/2019	RE2	SCAN/COPY ( 8 @0.10 PER PG)	0.80
10/22/2019	RE2	SCAN/COPY ( 8 @0.10 PER PG)	0.80
10/22/2019	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
10/22/2019	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
10/22/2019	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
10/22/2019	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
10/22/2019	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
10/22/2019	RE2	SCAN/COPY ( 9 @0.10 PER PG)	0.90
10/22/2019	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
10/22/2019	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
10/25/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	23.81
10/30/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	8.79
10/30/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	3.17
10/30/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.08
<b>Total Expenses for this Matter</b>			<b>\$685.56</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 10/31/2019**

**Total Fees \$44,688.50**

**Total Expenses 685.56**

**Total Due on Current Invoice \$45,374.06**

**Outstanding Balance from prior invoices as of 10/31/2019 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$38,840.82
123345	09/30/2019	\$23,355.00	\$10.10	\$23,365.10

**Total Amount Due on Current and Prior Invoices: \$192,757.47**

# **Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

November 30, 2019

Invoice 125547

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

## **STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/30/2019**

FEES	\$100,575.00
EXPENSES	\$9,556.08
<b>TOTAL CURRENT CHARGES</b>	<b>\$110,131.08</b>
<b>BALANCE FORWARD</b>	<b>\$954,539.14</b>
<b>A/R Adjustments</b>	<b>-\$118,231.08</b>
<b>TOTAL BALANCE DUE</b>	<b>\$946,439.14</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
IAWN	Nasatir, Iain A. W.	Partner	675.00	69.20	\$46,710.00
IDS	Scharf, Ilan D.	Partner	337.50	18.00	\$6,075.00
IDS	Scharf, Ilan D.	Partner	675.00	39.10	\$26,392.50
JIS	Stang, James I.	Partner	337.50	6.00	\$2,025.00
JIS	Stang, James I.	Partner	675.00	28.70	\$19,372.50
				161.00	\$100,575.00

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	5.00	\$3,375.00
AD	Asset Disposition [B130]	2.00	\$1,350.00
CO	Claims Admin/Objections[B310]	0.40	\$270.00
CP	Compensation Prof. [B160]	2.00	\$1,350.00
GC	General Creditors Comm. [B150]	3.70	\$2,497.50
IC	Insurance Coverage	69.20	\$46,710.00
PD	Plan & Disclosure Stmt. [B320]	54.70	\$36,922.50
TR	Travel	24.00	\$8,100.00
		161.00	<hr/> \$100,575.00



---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Air Fare [E110]	\$1,530.17
Auto Travel Expense [E109]	\$380.06
Working Meals [E111]	\$2,682.17
Conference Call [E105]	\$112.46
Hotel Expense [E110]	\$2,241.67
Pacer - Court Research	\$19.20
Reproduction Expense [E101]	\$1,484.40
Reproduction/ Scan Copy	\$4.10
Research [E106]	\$500.00
Travel Expense [E110]	\$601.85
	<hr/>
	\$9,556.08

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
11/12/2019	IDS	AA	Work on Franciscan confi.	0.80	675.00	\$540.00
11/14/2019	IDS	AA	Brief review of Franciscan documents.	2.00	675.00	\$1,350.00
11/15/2019	JIS	AA	Review Cemetery documents and 2006 finance committee minutes.	2.20	675.00	\$1,485.00
				<b>5.00</b>		<b>\$3,375.00</b>
<b>Asset Disposition [B130]</b>						
11/19/2019	JIS	AD	Meeting re real property sales.	2.00	675.00	\$1,350.00
				<b>2.00</b>		<b>\$1,350.00</b>
<b>Claims Admin/Objections[B310]</b>						
11/07/2019	IDS	CO	Respond to SCC inquiry regarding claims.	0.40	675.00	\$270.00
				<b>0.40</b>		<b>\$270.00</b>
<b>Compensation Prof. [B160]</b>						
11/25/2019	IDS	CP	Finalize PSZJ Fee application.	2.00	675.00	\$1,350.00
				<b>2.00</b>		<b>\$1,350.00</b>
<b>General Creditors Comm. [B150]</b>						
11/01/2019	JIS	GC	State court counsel call.	0.60	675.00	\$405.00
11/06/2019	JIS	GC	Telephone call to Brad Hall and Levi Monagle regarding mediation issues and committee call.	0.20	675.00	\$135.00
11/06/2019	JIS	GC	Committee Call.	1.00	675.00	\$675.00
11/11/2019	JIS	GC	Conference call with state court counsel re mediation.	1.20	675.00	\$810.00
11/26/2019	JIS	GC	Telephone call with survivor regarding case status.	0.30	675.00	\$202.50
11/26/2019	IDS	GC	Comments to Jim Stang regarding memo to committee.	0.40	675.00	\$270.00
				<b>3.70</b>		<b>\$2,497.50</b>
<b>Insurance Coverage</b>						
11/04/2019	IAWN	IC	Review Papas emails re mediation	0.50	675.00	\$337.50
11/05/2019	IAWN	IC	Reviewed emails between Committee, Papas and James I Stang re mediation and procedures, meeting etc.	0.80	675.00	\$540.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/05/2019	IAWN	IC	Prepared for mediation, travel etc.	1.40	675.00	\$945.00
11/06/2019	IAWN	IC	Review emails between Committee, James I Stang, Ilan Scharf and Papas re mediation	0.70	675.00	\$472.50
11/08/2019	IAWN	IC	Review Diocese's counter, James I Stang emails re same	0.40	675.00	\$270.00
11/08/2019	IAWN	IC	Research bad faith/white waiver case law in NM and AZ, analyze bad faith theory v. number of claimants and offer, send email to James I Stang re same	3.40	675.00	\$2,295.00
11/09/2019	IAWN	IC	Review James I Stang emails to Committee and replies, exchange emails with Ford re telephone conference	0.20	675.00	\$135.00
11/11/2019	IAWN	IC	Review emails from Committee re offer, attend call with Committee	1.30	675.00	\$877.50
11/11/2019	IAWN	IC	Telephone conferences with Ford re White waiver, review White waiver case from NM from Ford and analyze same	1.60	675.00	\$1,080.00
11/11/2019	IAWN	IC	Exchange emails and office conferences with James I Stang re anti-assignment clause, review settlement agreements and analyze re same, review Ford emails to James I Stang re same	3.50	675.00	\$2,362.50
11/12/2019	IAWN	IC	Review committee emails re mediation and offer, James I Stang emails re same and counter-offer	1.60	675.00	\$1,080.00
11/12/2019	IAWN	IC	Review James I Stang emails re order of blessed sacraments	0.10	675.00	\$67.50
11/13/2019	IAWN	IC	Review James I Stang and Committee emails re mediation, Franciscans etc.	0.70	675.00	\$472.50
11/14/2019	IAWN	IC	Review Franciscan production, download policies, commence review of policies for mediation	3.50	675.00	\$2,362.50
11/15/2019	IAWN	IC	Assemble materials for mediation (law for NM), review same	2.00	675.00	\$1,350.00
11/15/2019	IAWN	IC	Review Committee and Ilan Scharf and James I Stang emails re mediation and counter-offer	0.70	675.00	\$472.50
11/15/2019	IAWN	IC	Continued review of Franciscan policies	3.00	675.00	\$2,025.00
11/16/2019	IAWN	IC	Continued review of Franciscan policies	4.50	675.00	\$3,037.50
11/17/2019	IAWN	IC	Prepared for mediation and traveled to Albuquerque	4.00	675.00	\$2,700.00
11/17/2019	IAWN	IC	Reviewed Franciscan policies	4.00	675.00	\$2,700.00
11/18/2019	IAWN	IC	Attend mediation and meetings with Committee and counsel	15.00	675.00	\$10,125.00
11/19/2019	IAWN	IC	Attend mediation and meetings with Committee and	15.00	675.00	\$10,125.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			counsel			
11/20/2019	IAWN	IC	Office conferences with James I Stang re mediation; exchange emails with Ford re insurance etc.	0.80	675.00	\$540.00
11/21/2019	IAWN	IC	Review email from Committee member re mediation	0.20	675.00	\$135.00
11/22/2019	IAWN	IC	Review emails from Committee	0.10	675.00	\$67.50
11/27/2019	IAWN	IC	Review emails exchange between Papas and James I Stang re mediation	0.20	675.00	\$135.00
				<b>69.20</b>		<b>\$46,710.00</b>

**Plan & Disclosure Stmt. [B320]**

11/01/2019	JIS	PD	Telephone call with Iain Nasatir regarding mediation.	0.20	675.00	\$135.00
11/01/2019	IDS	PD	Call with SCC regarding mediation.	1.20	675.00	\$810.00
11/02/2019	JIS	PD	Meeting with Ford Elsaesser regarding mediation.	1.00	675.00	\$675.00
11/05/2019	IDS	PD	Mediation preparation; review claims analysis (.8); emails with SCC regarding meeting with Pappas and document meeting list (.7)	1.50	675.00	\$1,012.50
11/06/2019	JIS	PD	Telephone call to Ford Elsaesser regarding mediation issues (.2); email to state court counsel re same (.2).	0.40	675.00	\$270.00
11/06/2019	IDS	PD	Follow up regarding mediation scheduling for meetings with mediator.	0.80	675.00	\$540.00
11/07/2019	IDS	PD	Office conference with Jim Stang regarding committee meetings.	0.30	675.00	\$202.50
11/08/2019	JIS	PD	Review mediation brief.	0.30	675.00	\$202.50
11/11/2019	JIS	PD	Conference call with Committee re mediation.	1.40	675.00	\$945.00
11/11/2019	IDS	PD	Telephone conference with SCC regarding mediation offer.	1.70	675.00	\$1,147.50
11/11/2019	IDS	PD	Telephone conference with Jim Stang regarding mediation.	0.40	675.00	\$270.00
11/12/2019	IDS	PD	Review JIS email regarding counter.	0.20	675.00	\$135.00
11/12/2019	IDS	PD	Work on mediation process; committee schedule; meeting with mediator.	1.30	675.00	\$877.50
11/12/2019	IDS	PD	Telephone conference with B. Hall regarding mediation.	0.20	675.00	\$135.00
11/12/2019	IDS	PD	Emails with SCC regarding mediation.	0.40	675.00	\$270.00
11/12/2019	IDS	PD	Telephone conference with Jim Stang regarding mediation and counteroffer.	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/13/2019	JIS	PD	Telephone call Brad Hall regarding Wester meeting (.2); telephone call to Charles Paez re same (.1); review and forward Wester declaration (.3).	1.40	675.00	\$945.00
11/15/2019	JIS	PD	Call with state court counsel re mediation (.2) and finalize/send letter to mediator with counteroffer (.2).	0.40	675.00	\$270.00
11/15/2019	JIS	PD	Email to Leo Pappas regarding mediation with religious orders.	0.10	675.00	\$67.50
11/15/2019	IDS	PD	Continue mediation preparation; review claims analysis; demand; telephone conference with Jim Stang regarding same.	1.80	675.00	\$1,215.00
11/18/2019	JIS	PD	Attend mediation.	8.00	675.00	\$5,400.00
11/18/2019	IDS	PD	Prepare for and attend mediation.	9.00	675.00	\$6,075.00
11/18/2019	IDS	PD	Meet with Committee after mediation session.	2.50	675.00	\$1,687.50
11/19/2019	JIS	PD	Attend mediation.	8.00	675.00	\$5,400.00
11/19/2019	IDS	PD	Prepare for and attend mediation	10.00	675.00	\$6,750.00
11/19/2019	IDS	PD	Meet with SCC regarding next steps in mediation.	2.00	675.00	\$1,350.00
				<b>54.70</b>		<b>\$36,922.50</b>
<b>Travel</b>						
11/17/2019	JIS	TR	Travel from Los Angeles to mediation.	6.00	337.50	\$2,025.00
11/17/2019	IDS	TR	Travel to ABQ from NYC.	8.00	337.50	\$2,700.00
11/20/2019	IDS	TR	Travel from ABQ to Rochester.	10.00	337.50	\$3,375.00
				<b>24.00</b>		<b>\$8,100.00</b>

**TOTAL SERVICES FOR THIS MATTER:**

**\$100,575.00**

## Expenses

11/01/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	26.00
11/06/2019	AF	Air Fare [E110] American Airlines, Tkt. 0012387507968, from LAX to ABQ,, IAWN	327.50
11/07/2019	TE	Travel Expense [E110] Travel Agency Service Fee, JIS	50.00
11/11/2019	AF	Air Fare [E110] United Airlines, Tkt. 01675102593743, from JAX to IAH, IAH to ABQ, ABQ to ORD, ORD to JAX, M. Lucero	576.00
11/11/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	86.46
11/11/2019	TE	Travel Expense [E110] Priceline, Lucero ticket, IDS	33.12
11/13/2019	RE2	SCAN/COPY ( 17 @0.10 PER PG)	1.70
11/15/2019	AF	Air Fare [E110] United Airlines, Tkt. 01674752168611, from LAX to DEN, DEN to LAX, JIS	626.67
11/15/2019	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
11/15/2019	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
11/15/2019	TE	Travel Expense [E110] Travel Agency Service Fee, JIS	50.00
11/16/2019	TE	Travel Expense [E110] Chargepoint, JIS	10.00
11/17/2019	BM	Business Meal [E111] ZTrip, Working Meal, IAWN	40.45
11/17/2019	HT	Hotel Expense [E110] DoubleTree Albuquerque, 11/17/19-11/18/19, 1 night, IDS	131.78
11/17/2019	TE	Travel Expense [E110] Hudson News, IDS	7.47

---

11/18/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, JIS	41.12
11/18/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, JIS	12.92
11/18/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, JIS	18.98
11/18/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, JIS	11.18
11/18/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	17.36
11/18/2019	BM	Business Meal [E111] El Pinto Restaurant, Business Meal, IDS	1,172.61
11/18/2019	BM	Business Meal [E111] Vernon's Speakeasy, Business Meal, JIS	1,349.59
11/19/2019	BM	Business Meal [E111] Monte Carlo Steak, Working Meal, IAWN	89.40
11/19/2019	HT	Hotel Expense [E110] DoubleTree Albuquerque, 11/18/19-11/19/19, 1 night, M. Lucero	321.66
11/20/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, JIS	23.22
11/20/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	19.57
11/20/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	13.63
11/20/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	11.16

---

11/20/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	17.40
11/20/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	13.05
11/20/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	17.77
11/20/2019	BM	Business Meal [E111] Keva Juice, Working Meal, JIS	19.34
11/20/2019	HT	Hotel Expense [E110] Albuquerque Marriot Pyramid, 11/17/19-11/19/19, 2 nights, IAWN	568.21
11/20/2019	HT	Hotel Expense [E110] Courtyard 1L7, 11/19/19-11/20/19, 1 night, IAWN	294.02
11/20/2019	TE	Travel Expense [E110] Hudson News, IDS	10.93
11/21/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	23.44
11/21/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	21.07
11/21/2019	BM	Business Meal [E111] TJ Pronto, Working Meal, JIS	10.78
11/21/2019	HT	Hotel Expense [E110] Hotel Andaluz, 11/19/19-11/20/19, 1 night, IDS	227.16
11/21/2019	HT	Hotel Expense [E110] Albuquerque Marriott, 11/17/19-11/20/19, 3 nights, JIS	698.84
11/22/2019	AT	Auto Travel Expense [E109] Laureen's Pet Care Transportation Services, from residence to LAX, IAWN	100.00
11/22/2019	TE	Travel Expense [E110] Mileage, 389 miles roundtrip, C. Montoya	440.33



---

11/23/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, JIS	18.19
11/27/2019	RE	( 2240 @0.20 PER PG)	448.00
11/27/2019	RE	( 140 @0.20 PER PG)	28.00
11/27/2019	RE	( 1540 @0.20 PER PG)	308.00
11/27/2019	RE	( 1400 @0.20 PER PG)	280.00
11/27/2019	RE	( 2096 @0.20 PER PG)	419.20
11/27/2019	RE	( 6 @0.20 PER PG)	1.20
11/30/2019	PAC	Pacer - Court Research	19.20
11/30/2019	RS	Research [E106] Everlaw, Inv. 22444	500.00
<b>Total Expenses for this Matter</b>			<b>\$9,556.08</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 11/30/2019**

**Total Fees \$100,575.00**

**Total Expenses 9,556.08**

**Total Due on Current Invoice \$110,131.08**

**Outstanding Balance from prior invoices as of 11/30/2019 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$38,840.82
123345	09/30/2019	\$23,355.00	\$10.10	\$23,365.10
124730	10/31/2019	\$44,688.50	\$685.56	\$45,374.06
124969	01/31/2020	\$198,857.50	\$4,949.13	\$203,806.63
125212	02/29/2020	\$229,550.00	\$5,024.17	\$234,574.17
125465	03/31/2020	\$49,632.50	\$2,118.58	\$51,751.08
125486	04/30/2020	\$27,742.50	\$908.67	\$28,651.17
125487	05/31/2020	\$85,545.00	\$500.00	\$86,045.00
125545	12/31/2019	\$37,482.50	\$1,240.04	\$38,722.54

**Total Amount Due on Current and Prior Invoices: \$946,439.14**

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 14  
Invoice 125547  
November 30, 2019

---

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

December 31, 2019

Invoice 125545

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/2019**

FEES	\$37,482.50
EXPENSES	\$1,240.04
<b>TOTAL CURRENT CHARGES</b>	<b>\$38,722.54</b>
<b>BALANCE FORWARD</b>	<b>\$954,689.14</b>
<b>A/R Adjustments</b>	<b>-\$38,872.54</b>
<b>TOTAL BALANCE DUE</b>	<b>\$954,539.14</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
IAWN	Nasatir, Iain A. W.	Partner	675.00	20.30	\$13,702.50
IDS	Scharf, Ilan D.	Partner	675.00	15.40	\$10,395.00
JIS	Stang, James I.	Partner	675.00	17.20	\$11,610.00
KHB	Brown, Kenneth H.	Partner	675.00	0.50	\$337.50
SWG	Golden, Steven W.	Associate	575.00	2.50	\$1,437.50
				<hr/> 55.90	<hr/> \$37,482.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	11.80	\$7,715.00
AD	Asset Disposition [B130]	3.40	\$2,295.00
BL	Bankruptcy Litigation [L430]	1.40	\$945.00
CO	Claims Admin/Objections[B310]	2.80	\$1,890.00
GC	General Creditors Comm. [B150]	3.50	\$2,362.50
IC	Insurance Coverage	9.90	\$6,682.50
PD	Plan & Disclosure Stmt. [B320]	23.10	\$15,592.50
		55.90	<hr/> \$37,482.50

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Air Fare [E110]	\$634.00
Conference Call [E105]	\$60.44
Pacer - Court Research	\$2.80
Research [E106]	\$500.00
Travel Expense [E110]	\$42.80
	<hr/>
	\$1,240.04

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
12/10/2019	IDS	AA	Follow up research regarding alter ego.	0.80	675.00	\$540.00
12/12/2019	IDS	AA	Review revised property list.	0.70	675.00	\$472.50
12/16/2019	IDS	AA	Review Franciscan documents.	1.70	675.00	\$1,147.50
12/20/2019	IDS	AA	Email to L. Ford regarding alter ego research.	0.20	675.00	\$135.00
12/20/2019	IDS	AA	Preliminary research regarding alter ego.	2.10	675.00	\$1,417.50
12/23/2019	SWG	AA	Call with Ilan Scharf regarding research project on alter ego of affiliates.	0.20	575.00	\$115.00
12/24/2019	SWG	AA	Research re: alter ego	1.30	575.00	\$747.50
12/26/2019	JIS	AA	Review third document production (partial).	3.80	675.00	\$2,565.00
12/26/2019	SWG	AA	Research and draft lengthy email regarding alter ego theory for affiliated entities.	1.00	575.00	\$575.00
				<b>11.80</b>		<b>\$7,715.00</b>
<b>Asset Disposition [B130]</b>						
12/11/2019	JIS	AD	Email to Ford Elsaesser regarding real property NDA (.1) and telephone call with Ed Mazel re disclosure of real estate info (.2).	0.30	675.00	\$202.50
12/11/2019	IDS	AD	Continue analysis of Geltmore property purchase proposed.	1.30	675.00	\$877.50
12/11/2019	IDS	AD	Review markup of property offer from debtor.	0.40	675.00	\$270.00
12/12/2019	JIS	AD	Review FE letter re real property and forward to client with cover letter.	0.20	675.00	\$135.00
12/12/2019	IDS	AD	Review case from Ford Elsaesser regarding asset sales.	0.40	675.00	\$270.00
12/12/2019	IDS	AD	Telephone call with James Stang regarding asset sales.	0.30	675.00	\$202.50
12/17/2019	JIS	AD	Conference call with Debtor regarding real property.	0.50	675.00	\$337.50
				<b>3.40</b>		<b>\$2,295.00</b>
<b>Bankruptcy Litigation [L430]</b>						
12/10/2019	IDS	BL	Review and update research regarding litigation options.	1.40	675.00	\$945.00
				<b>1.40</b>		<b>\$945.00</b>



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Claims Admin/Objections[B310]</b>						
12/10/2019	JIS	CO	Telephone call Leo Papas regarding questions (.2); Telephone call S. Sanchez re same (.2); draft and send email out to unrepresented survivors regarding questions (.6).	1.00	675.00	\$675.00
12/10/2019	JIS	CO	Draft and send emails/letters to unrepresented claimants regarding questions from AD and insurers (1.2); telephone calls to Sarah Sanchez re same (.4); Telephone call to Leo Papas re same (.2).	1.80	675.00	\$1,215.00
				<b>2.80</b>		<b>\$1,890.00</b>
<b>General Creditors Comm. [B150]</b>						
12/09/2019	JIS	GC	Attend Court status conference.	0.50	675.00	\$337.50
12/11/2019	IDS	GC	Attend committee call.	0.80	675.00	\$540.00
12/18/2019	IDS	GC	Email update to Committee.	0.40	675.00	\$270.00
12/20/2019	IDS	GC	Telephone conference with SCC regarding mediation/litigation options.	1.20	675.00	\$810.00
12/20/2019	IDS	GC	Follow up with Jim Stang regarding SCC call.	0.30	675.00	\$202.50
12/22/2019	JIS	GC	Telephone call with survivor regarding follow up questions.	0.30	675.00	\$202.50
				<b>3.50</b>		<b>\$2,362.50</b>
<b>Insurance Coverage</b>						
12/11/2019	IAWN	IC	Office conference with James I Stang re insurance request, review emails re same from James I Stang to debtor	0.50	675.00	\$337.50
12/11/2019	IAWN	IC	Review Ford email re insurance documentation, review file re same and analyze.	2.20	675.00	\$1,485.00
12/13/2019	IAWN	IC	Review SCC emails	0.70	675.00	\$472.50
12/16/2019	IAWN	IC	Review draft letter to debtor, comments re same	0.80	675.00	\$540.00
12/16/2019	IDS	IC	Review questions from insurers.	1.80	675.00	\$1,215.00
12/19/2019	IAWN	IC	Exchange emails with Hurley re Continental information, with James I Stang	0.20	675.00	\$135.00
12/20/2019	IAWN	IC	Prepare for call with Hurley, telephone conference with Hurley re mediation and insurance, exchange emails with James I Stang and Hurley re same	1.00	675.00	\$675.00
12/24/2019	IAWN	IC	Review letter re insurance from James I Stang, draft email re insurance comments, exchange emails with	1.00	675.00	\$675.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			James I Stang re. same, telephone conference with James I Stang re same			
12/26/2019	IAWN	IC	Review James I Stang email re Iain AW Nasatir's insurance comments and related emails	0.40	675.00	\$270.00
12/29/2019	IAWN	IC	Review Ford email re bills from coverage counsel, review bills, review emails from James I Stang to debtor re same	1.30	675.00	\$877.50
				<u>9.90</u>		<u>\$6,682.50</u>

**Plan & Disclosure Stmt. [B320]**

12/02/2019	JIS	PD	Telephone call with mediator regarding status conference statement.	0.10	675.00	\$67.50
12/06/2019	IAWN	PD	Review emails re mediators position re real estate etc	0.70	675.00	\$472.50
12/06/2019	IAWN	PD	Review James I Stang and debtor's emails re interrogatories, and related emails, office conference with James I Stang re same	0.90	675.00	\$607.50
12/06/2019	JIS	PD	Draft emails to committee/SCC regarding status of document production.	0.30	675.00	\$202.50
12/06/2019	JIS	PD	Review status conference order and email to Committee and State Court Counsel re same.	0.20	675.00	\$135.00
12/08/2019	IAWN	PD	Review and sample interrogatories from debtor, analyze privilege issue in responding to interrogatories, exchange emails with James I Stang, Ilan Scharf re privilege and correct party re interrogatories analyze privilege issue in responding to interrogatories, exchange emails with James I Stang, Ilan Scharf re privilege and correct party re interrogatories	2.20	675.00	\$1,485.00
12/09/2019	IAWN	PD	Review emails re production, review production sample same office conference with James I Stang	4.20	675.00	\$2,835.00
12/10/2019	IAWN	PD	Review emails re document production, mediation etc. review correspondence from Papas etc.	3.80	675.00	\$2,565.00
12/10/2019	JIS	PD	Telephone call state court counsel re responses to questionnaires.	0.40	675.00	\$270.00
12/12/2019	JIS	PD	Review FE letter regarding properties and accompanying schedule (.4); telephone calls with Ken Brown regarding 10th Cir. authority on 3d party releases (.3); review 10th Cir. cases on 3d party releases (1.3); draft email response to FE regarding properties (.5).	2.20	675.00	\$1,485.00
12/12/2019	JIS	PD	Telephone call with Ilan Scharf regarding response	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			to FE real property letter.			
12/12/2019	KHB	PD	Work on letter to Debtor's counsel re underutilization of assets.	0.30	675.00	\$202.50
12/12/2019	KHB	PD	Email to J. Stang re 10th Circuit authority on 3rd party releases.	0.20	675.00	\$135.00
12/12/2019	IDS	PD	Telephone call with SCC regarding properties and mediation.	0.80	675.00	\$540.00
12/19/2019	JIS	PD	Telephone call with survivor regarding mediation.	0.70	675.00	\$472.50
12/19/2019	IDS	PD	Email to Committee regarding mediation.	0.30	675.00	\$202.50
12/19/2019	IDS	PD	Emails with B. Hall regarding mediation.	0.30	675.00	\$202.50
12/20/2019	IDS	PD	Telephone conference with Jim Stang regarding mediation.	0.20	675.00	\$135.00
12/23/2019	IAWN	PD	Review emails from SCC re interrogatory objections	0.40	675.00	\$270.00
12/24/2019	JIS	PD	Review proposed text of letter to Archdiocese.	3.30	675.00	\$2,227.50
12/26/2019	JIS	PD	Office conference with Iain Nasatir regarding response to insurers and draft email to state court counsel.	0.30	675.00	\$202.50
12/30/2019	JIS	PD	Conference call with state court counsel re questions.	1.10	675.00	\$742.50
				<u>23.10</u>		<u>\$15,592.50</u>

**TOTAL SERVICES FOR THIS MATTER:**

**\$37,482.50**

---

**Expenses**

12/02/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	1.25
12/06/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.07
12/06/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.07
12/06/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	8.25
12/13/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	50.80
12/18/2019	TE	Travel Expense [E110] Allianz travel insurance, IDS	42.80
12/19/2019	AF	Air Fare [E110] Delta Airlines, Tkt. 00624117233040, from JFK to LAX, LAX to ABQ, ABQ to LAX, LAX to JFK, IDS	634.00
12/31/2019	PAC	Pacer - Court Research	2.80
12/31/2019	RS	Research [E106] Everlaw, Inv. 23366	500.00

**Total Expenses for this Matter**

**\$1,240.04**

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 12/31/2019**

**Total Fees \$37,482.50**

**Total Expenses 1,240.04**

**Total Due on Current Invoice \$38,722.54**

**Outstanding Balance from prior invoices as of 12/31/2019 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$38,840.82
123345	09/30/2019	\$23,355.00	\$10.10	\$23,365.10
124730	10/31/2019	\$44,688.50	\$685.56	\$45,374.06
124933	11/30/2019	\$108,675.00	\$9,556.08	\$118,231.08
124969	01/31/2020	\$198,857.50	\$4,949.13	\$203,806.63
125212	02/29/2020	\$229,550.00	\$5,024.17	\$234,574.17
125465	03/31/2020	\$49,632.50	\$2,118.58	\$51,751.08
125486	04/30/2020	\$27,742.50	\$908.67	\$28,651.17
125487	05/31/2020	\$85,545.00	\$500.00	\$86,045.00

**Total Amount Due on Current and Prior Invoices: \$954,539.14**

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 11  
Invoice 125545  
December 31, 2019

---

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

January 31, 2020

Invoice 124969

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 01/31/2020**

FEES	\$198,857.50
EXPENSES	\$4,949.13
<b>TOTAL CURRENT CHARGES</b>	<b>\$203,806.63</b>
<b>BALANCE FORWARD</b>	<b>\$349,861.09</b>
<b>TOTAL BALANCE DUE</b>	<b>\$553,667.72</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
CHM	Mackle, Cia H.	Counsel	675.00	15.70	\$10,597.50
GSG	Greenwood, Gail S.	Counsel	675.00	63.00	\$42,525.00
HDH	Hochman, Harry D.	Counsel	675.00	0.80	\$540.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	14.10	\$9,517.50
IDS	Scharf, Ilan D.	Partner	675.00	22.70	\$15,322.50
JIS	Stang, James I.	Partner	675.00	24.40	\$16,470.00
KHB	Brown, Kenneth H.	Partner	675.00	68.60	\$46,305.00
LAF	Forrester, Leslie A.	Other	450.00	4.90	\$2,205.00
SWG	Golden, Steven W.	Associate	625.00	88.60	\$55,375.00
				<hr/> 302.80	<hr/> \$198,857.50



---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition [B130]	1.90	\$1,282.50
DO	Document Production	15.70	\$10,597.50
GC	General Creditors Comm. [B150]	6.30	\$4,252.50
IC	Insurance Coverage	13.40	\$9,045.00
LN	Litigation (Non-Bankruptcy)	0.30	\$202.50
OCA	Outgoing Claims Analysis	238.10	\$155,185.00
PD	Plan & Disclosure Stmt. [B320]	27.00	\$18,225.00
SL	Stay Litigation [B140]	0.10	\$67.50
		302.80	<hr/> \$198,857.50

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Air Fare [E110]	\$1,910.14
Conference Call [E105]	\$192.43
Hotel Expense [E110]	\$1,442.83
Lexis/Nexis- Legal Research [E	\$136.87
Reproduction/ Scan Copy	\$167.70
Research [E106]	\$500.00
Travel Expense [E110]	\$599.16
	<hr/>
	\$4,949.13

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Disposition [B130]</b>						
01/14/2020	JIS	AD	Telephone call with FE regarding community garden lease.	0.40	675.00	\$270.00
01/14/2020	IDS	AD	Review email from F. Elsaesser regarding community garden lease.	0.30	675.00	\$202.50
01/16/2020	IAWN	AD	Review Community Garden emails from SCC	0.70	675.00	\$472.50
01/16/2020	KHB	AD	Confer with J. Stang re unauthorized lease for community garden property.	0.30	675.00	\$202.50
01/16/2020	KHB	AD	Emails with J. Stang and committee re unauthorized lease for community garden property.	0.20	675.00	\$135.00
				<b>1.90</b>		<b>\$1,282.50</b>
<b>Document Production</b>						
01/07/2020	CHM	DO	Telephone conferences with G. Greenwood and K. Brown re document review.	0.60	675.00	\$405.00
01/07/2020	CHM	DO	Review documents in Everlaw.	2.30	675.00	\$1,552.50
01/08/2020	CHM	DO	Review documents in Everlaw.	0.40	675.00	\$270.00
01/09/2020	CHM	DO	Review documents in Everlaw.	2.60	675.00	\$1,755.00
01/13/2020	CHM	DO	Review documents in Everlaw.	1.60	675.00	\$1,080.00
01/15/2020	CHM	DO	Review documents in Everlaw.	0.90	675.00	\$607.50
01/16/2020	CHM	DO	Review documents in Everlaw.	1.60	675.00	\$1,080.00
01/17/2020	CHM	DO	Complete review of documents in Everlaw and draft memorandum re contents; email to J. Stang and K. Brown.	3.80	675.00	\$2,565.00
01/19/2020	CHM	DO	Review email from G. Greenwood re structure of Catholic Foundation and reply.	0.20	675.00	\$135.00
01/19/2020	CHM	DO	Review documents in Everlaw.	0.80	675.00	\$540.00
01/20/2020	CHM	DO	Review email from J. Stang re financial statements and reply.	0.10	675.00	\$67.50
01/22/2020	CHM	DO	Add additional documents to Everlaw database and briefly review contents thereof.	0.80	675.00	\$540.00
				<b>15.70</b>		<b>\$10,597.50</b>
<b>General Creditors Comm. [B150]</b>						
01/02/2020	IDS	GC	Telephone conference with unrepresented claimant regarding status of case.	0.40	675.00	\$270.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/03/2020	IDS	GC	Telephone conference with SCC regarding mediation, case status.	0.80	675.00	\$540.00
01/07/2020	JIS	GC	Memo for committee meeting.	0.40	675.00	\$270.00
01/08/2020	JIS	GC	Committee call.	0.80	675.00	\$540.00
01/10/2020	IDS	GC	Telephone conference with Jim Stang regarding SCC call.	0.20	675.00	\$135.00
01/10/2020	IDS	GC	Attend call with SCC regarding mediation.	0.80	675.00	\$540.00
01/14/2020	JIS	GC	Telephone call with two survivors regarding status.	0.80	675.00	\$540.00
01/16/2020	JIS	GC	Telephone call from personal injury creditor re case status.	0.10	675.00	\$67.50
01/16/2020	IDS	GC	Telephone call with James Stang regarding claims, call agenda.	0.20	675.00	\$135.00
01/17/2020	JIS	GC	Conference call with state court counsel re status.	0.70	675.00	\$472.50
01/17/2020	IDS	GC	SCC call regarding mediation, asset analysis.	0.70	675.00	\$472.50
01/20/2020	JIS	GC	telephone call with survivor re case status	0.20	675.00	\$135.00
01/20/2020	JIS	GC	telephone call with survivor re case status	0.20	675.00	\$135.00
				<b>6.30</b>		<b>\$4,252.50</b>

### Insurance Coverage

01/02/2020	IAWN	IC	Review James I Stang emails re Papas inquiry	0.10	675.00	\$67.50
01/02/2020	IAWN	IC	Draft and send email to Papas re inquiry	0.20	675.00	\$135.00
01/02/2020	IAWN	IC	Review emails between SCC and James I Stang re draft letter re insurer interrogatories	0.40	675.00	\$270.00
01/03/2020	IAWN	IC	Exchange emails with Papas re call	0.10	675.00	\$67.50
01/07/2020	IAWN	IC	Prepare for call with Papas, and review file re previous information provided, status of insurance post mediation, etc.	1.40	675.00	\$945.00
01/07/2020	IAWN	IC	Telephone conference with Papas re mediation, etc.	1.90	675.00	\$1,282.50
01/07/2020	IAWN	IC	Review files re severity charts, and forward same to Papas	0.60	675.00	\$405.00
01/07/2020	IAWN	IC	Draft and send email to James I Stang and Ilan Scharf re severity chart and call with Papas	0.20	675.00	\$135.00
01/07/2020	IAWN	IC	Review draft interrogatories and analyze (.3), send comments on same to James I Stang (.3) and review James I Stang response (.1)	0.70	675.00	\$472.50
01/10/2020	IAWN	IC	Review Bloomberg article re ADSF assets and SCC comments re same	0.80	675.00	\$540.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/10/2020	IAWN	IC	Reviewed cover letter re insurer interrogatory responses from James I Stang and suggested changes	0.30	675.00	\$202.50
01/14/2020	IAWN	IC	Review James I Stang email re CM policies	0.10	675.00	\$67.50
01/20/2020	IAWN	IC	Review and analyze Brad Hall email re mediation resources and attached charts	1.30	675.00	\$877.50
01/24/2020	IAWN	IC	Review James I SDtang email re minutes and SOL admission and exchange emails with James I Stang re same	0.40	675.00	\$270.00
01/27/2020	IAWN	IC	Review James I Stang email forwarding Ford's papas email, (.1) draft and send email to Ford re common approach re Papas (.2), review Ford email re same (.1)	0.40	675.00	\$270.00
01/31/2020	IAWN	IC	Prepare for mediation by reviewing insurance charts and coverage information.	4.50	675.00	\$3,037.50
				<b>13.40</b>		<b>\$9,045.00</b>

#### **Litigation (Non-Bankruptcy)**

01/02/2020	KHB	LN	Confer with J. Stang re litigation options in light of mediation impasse.	0.30	675.00	\$202.50
				<b>0.30</b>		<b>\$202.50</b>

#### **Outgoing Claims Analysis**

01/03/2020	JIS	OCA	Telephone call with Ken Brown re discovery review (.3) and review notes from JIS review of discovery responses and forward to Ken Brown.	0.60	675.00	\$405.00
01/03/2020	KHB	OCA	Telephone call with J. Stang re document review and fraudulent Transfer analysis fee claims.	0.40	675.00	\$270.00
01/05/2020	IDS	OCA	Review Steven Golden research regarding Alter Ego; L. Ford research regarding same.	3.80	675.00	\$2,565.00
01/06/2020	KHB	OCA	Review documents re fraudulent transfer analysis.	3.00	675.00	\$2,025.00
01/06/2020	KHB	OCA	Confer with J. Stang re fraudulent transfer analysis.	0.20	675.00	\$135.00
01/07/2020	JIS	OCA	Telephone call with Ken Brown regarding preparation of standing motions and avoidance action analysis.	1.20	675.00	\$810.00
01/07/2020	KHB	OCA	Analyze legal theories of liability for Transfers to DLF and Real Estate Trust re Estate Trust.	0.60	675.00	\$405.00
01/07/2020	KHB	OCA	Review ADSF Document production.	1.40	675.00	\$945.00
01/07/2020	KHB	OCA	Confer with J. Stang, Cia Mackle and G. Greenwood re document review and analysis.	1.20	675.00	\$810.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/07/2020	KHB	OCA	Confer with J. Stang re 3rd party outgoing claims analysis.	0.10	675.00	\$67.50
01/07/2020	GSG	OCA	Conference call with J. Stang, K. Brown, and C. Mackle re document review and litigation.	1.30	675.00	\$877.50
01/08/2020	KHB	OCA	Emails with K. McDaniel re settlement.	0.20	675.00	\$135.00
01/08/2020	KHB	OCA	Review 341 transcript and document production re analysis of outgoing claims.	3.00	675.00	\$2,025.00
01/08/2020	GSG	OCA	Review and tag documents from second production; email status and results.	3.70	675.00	\$2,497.50
01/08/2020	GSG	OCA	Review and tag documents from third production.	2.30	675.00	\$1,552.50
01/08/2020	GSG	OCA	Review and search documents re committee meetings and minutes; prepare binder re J. Stang highlights.	2.00	675.00	\$1,350.00
01/08/2020	GSG	OCA	Confer with C. Mackle re database.	0.30	675.00	\$202.50
01/09/2020	JIS	OCA	Review Ken Brown email re avoidance issues and forward to SCC.	0.40	675.00	\$270.00
01/09/2020	JIS	OCA	Telephone call with Ken Brown re DLF and property trust background and trust theories.	0.50	675.00	\$337.50
01/09/2020	JIS	OCA	Review alter ego research.	0.30	675.00	\$202.50
01/09/2020	KHB	OCA	Emails to S. Golden re legal research on Alter Ego and self settled Trusts.	0.70	675.00	\$472.50
01/09/2020	KHB	OCA	Review documents re analysis of grounds to bring alleged Trust assets into estate.	0.80	675.00	\$540.00
01/09/2020	LAF	OCA	Legal research re: NM UFTA & Uniform Trust Code.	0.50	450.00	\$225.00
01/09/2020	GSG	OCA	Confer with K. Brown re fraudulent transfer issues and document review.	0.20	675.00	\$135.00
01/10/2020	KHB	OCA	Confer with Gail Greenwood re document review and analysis of claims.	0.20	675.00	\$135.00
01/10/2020	KHB	OCA	Emails with G. Greenwood re legal authority on self-settled Trust and fraudulent Transfer issues.	0.30	675.00	\$202.50
01/10/2020	LAF	OCA	Legal research re: Uniform Trust Code.	0.30	450.00	\$135.00
01/10/2020	GSG	OCA	Review ADSF documents from third production; tag issues and binders.	4.50	675.00	\$3,037.50
01/10/2020	GSG	OCA	Review collected documents re RE trust and DLF trust, including service agreements.	1.40	675.00	\$945.00
01/11/2020	KHB	OCA	Analyze SOFA's and authorities re grounds to challenge Debtors claims that assets are not property of estate.	4.30	675.00	\$2,902.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/12/2020	GSG	OCA	Review petition and 341 transcript re fraudulent transfer issues; review and respond to K. Brown emails.	2.90	675.00	\$1,957.50
01/13/2020	KHB	OCA	Confer with Gail Greenwood re analysis of claims re RE Trust and DLF.	0.20	675.00	\$135.00
01/13/2020	KHB	OCA	Conference call with S. Golden and G. Greenwood re analysis of claims re RE Trust and DLF.	0.50	675.00	\$337.50
01/13/2020	KHB	OCA	Telephone call with Lisa Ford re Alter Ego issues.	0.20	675.00	\$135.00
01/13/2020	KHB	OCA	Confer with Cia Mackel re review of Catholic Foundation documents.	0.20	675.00	\$135.00
01/13/2020	KHB	OCA	Review authority re Parish assets and property allegedly held in trust as assets of estate.	3.10	675.00	\$2,092.50
01/13/2020	GSG	OCA	Review database and tag documents re fraudulent transfer issues.	6.90	675.00	\$4,657.50
01/13/2020	GSG	OCA	Conference call with K. Brown and S. Golden.	0.50	675.00	\$337.50
01/13/2020	GSG	OCA	Review and organize trust and restructure documents.	1.60	675.00	\$1,080.00
01/13/2020	GSG	OCA	Research / review cases re resulting trusts; notes re same.	1.10	675.00	\$742.50
01/14/2020	HDH	OCA	Conference with James I. Stang and telephone conference with Kenneth H. Brown	0.80	675.00	\$540.00
01/14/2020	KHB	OCA	Emails with S. Golden re Alter Ego research concerning trusts.	0.20	675.00	\$135.00
01/14/2020	KHB	OCA	Review deposition transcript of John Huchmala, ADSF monthly manager.	2.70	675.00	\$1,822.50
01/14/2020	GSG	OCA	Follow-up review / research re resulting trust and tracing analysis.	0.50	675.00	\$337.50
01/14/2020	GSG	OCA	Review parish incorporation documents and prepare chronology.	2.30	675.00	\$1,552.50
01/14/2020	GSG	OCA	Review financials; review deeds and schedules re properties held by ADSF.	5.30	675.00	\$3,577.50
01/14/2020	GSG	OCA	Email summary conclusions and concerns re debtor schedules.	0.50	675.00	\$337.50
01/14/2020	GSG	OCA	Research database and review post-petition lease by RE corporation.	0.20	675.00	\$135.00
01/14/2020	SWG	OCA	Research regarding fraudulent transfer and alter ego theories of recovery.	8.00	625.00	\$5,000.00
01/15/2020	JIS	OCA	Update financial due diligence documents.	0.30	675.00	\$202.50
01/15/2020	KHB	OCA	Analyze financial statements and documents re	5.20	675.00	\$3,510.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			estate claims concerning RE Trust and DLF.			
01/15/2020	GSG	OCA	Review Huchmala testimony.	0.30	675.00	\$202.50
01/15/2020	GSG	OCA	Review database re additional financials / audits.	1.20	675.00	\$810.00
01/15/2020	GSG	OCA	Review ADSF reports and financials re timeline of financial problems.	1.40	675.00	\$945.00
01/15/2020	GSG	OCA	Review and tag supplemental documents uploaded to database.	1.30	675.00	\$877.50
01/15/2020	GSG	OCA	Confer with K. Brown re transfer analysis.	0.30	675.00	\$202.50
01/15/2020	GSG	OCA	Review documents and draft factual background re restructuring.	5.20	675.00	\$3,510.00
01/15/2020	SWG	OCA	Research regarding fraudulent transfer and alter ego theories of recovery.	7.70	625.00	\$4,812.50
01/16/2020	KHB	OCA	Work on analysis of theories to bring alleged Trust property back into estate.	1.80	675.00	\$1,215.00
01/16/2020	KHB	OCA	Confer with G. Greenwood re analysis of theories to bring alleged Trust property back into estate.	0.30	675.00	\$202.50
01/16/2020	GSG	OCA	Draft factual background re memo re fraudulent transfer recovery.	4.80	675.00	\$3,240.00
01/16/2020	GSG	OCA	Review database re bank transfers.	0.80	675.00	\$540.00
01/16/2020	GSG	OCA	Review database re Foundation / Cemetery issues.	0.80	675.00	\$540.00
01/16/2020	GSG	OCA	Draft legal analysis re fraudulent transfer analysis.	3.00	675.00	\$2,025.00
01/16/2020	GSG	OCA	Confer with K. Brown re fraudulent transfer analysis.	0.30	675.00	\$202.50
01/16/2020	SWG	OCA	Continue research/ drafting of memo regarding fraudulent transfer and alter ego.	5.00	625.00	\$3,125.00
01/17/2020	JIS	OCA	Telephone call with Ken Brown regarding avoidance theories.	0.30	675.00	\$202.50
01/17/2020	KHB	OCA	Emails with S. Golden and G. Greenwood re analysis of legal / factual basis to bring alleged Trust assets into estate.	0.50	675.00	\$337.50
01/17/2020	KHB	OCA	Confer with J. Stang re theories for bringing alleged Trust properties back into estate.	0.20	675.00	\$135.00
01/17/2020	KHB	OCA	Work on legal and factual analysis re theories for bringing alleged Trust properties back into estate.	1.80	675.00	\$1,215.00
01/17/2020	GSG	OCA	Draft legal memo re facts and resulting trust analysis.	5.40	675.00	\$3,645.00
01/17/2020	GSG	OCA	Call with S. Golden re facts and avoidance arguments.	0.70	675.00	\$472.50



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/17/2020	SWG	OCA	Continue research and memorandum.	8.40	625.00	\$5,250.00
01/18/2020	KHB	OCA	Analyze claims against DLF and RE Trust.	2.30	675.00	\$1,552.50
01/18/2020	SWG	OCA	Continue in-depth research and memorandum drafting re: outgoing claims	5.50	625.00	\$3,437.50
01/19/2020	KHB	OCA	Review emails from State court counsel re Alter Ego issues and prepare email to J. Stang re analysis. of estates Alter Ego claims.	1.20	675.00	\$810.00
01/19/2020	KHB	OCA	Review 341 transcript re estates rights to DLF and assets in Real Estate Trust.	3.20	675.00	\$2,160.00
01/19/2020	KHB	OCA	Confer with J. Stang re outgoing claims analysis.	0.50	675.00	\$337.50
01/19/2020	KHB	OCA	Email to State Court Council re State law legal issues.	0.50	675.00	\$337.50
01/19/2020	KHB	OCA	Confer with G. Greenwood re document review.	0.30	675.00	\$202.50
01/19/2020	SWG	OCA	Continue comprehensive research/memorandum drafting re: outbound claims	5.80	625.00	\$3,625.00
01/20/2020	JIS	OCA	review CMackle memo re Catholic Foundation (.4) and call with KBrown re conclusions and follow up (.3)	0.70	675.00	\$472.50
01/20/2020	KHB	OCA	Confer with J. Stang re fraudulent transfer issues.	0.20	675.00	\$135.00
01/20/2020	KHB	OCA	Review authorities re same and confer with S. Golden re fraudulent transfer issues re real estate and DCF Trust.	0.60	675.00	\$405.00
01/20/2020	KHB	OCA	Revew memo from C. Mackle re assets of Catholic Foundation.	0.60	675.00	\$405.00
01/20/2020	KHB	OCA	Email to C. Mackle re additional analysis.	0.40	675.00	\$270.00
01/20/2020	KHB	OCA	Confer with J. Stang re ability to recover assets of Catholic Foundation.	0.30	675.00	\$202.50
01/20/2020	KHB	OCA	Analyze Catholic Foundation Financial statements and evaluate potential claims that Foundation holds property of estate.	1.00	675.00	\$675.00
01/20/2020	SWG	OCA	Continue research and drafting of comprehensive memorandum	6.50	625.00	\$4,062.50
01/21/2020	JIS	OCA	Call with Ken Brown and Gail Greenwood regarding memos on avoidance actions.	0.40	675.00	\$270.00
01/21/2020	JIS	OCA	Review Dropbox materials re memos and telephone conference with GGreenwood re same; review New Mexico law on unincorporated associations.	1.80	675.00	\$1,215.00
01/21/2020	KHB	OCA	Confer with S. Golden re outgoing alter ego / sub con analysis.	0.30	675.00	\$202.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/21/2020	KHB	OCA	Analyze authorities re expanded reach back period for fraudulent transfers when IRS claim exists.	0.40	675.00	\$270.00
01/21/2020	KHB	OCA	Emails to Gail Greenwood re expanded reach back period for fraudulent transfers when IRS claim exists.	0.20	675.00	\$135.00
01/21/2020	KHB	OCA	Confer with J. Stang and Greenfield re analysis of claims to bring property into the estate.	0.40	675.00	\$270.00
01/21/2020	KHB	OCA	Review NM statute requiring unincorporated associations to record statements with county clerk.	0.30	675.00	\$202.50
01/21/2020	KHB	OCA	Confer with S. Golden re NM statute requiring unincorporated associations to record statements with country clerk.	0.10	675.00	\$67.50
01/21/2020	LAF	OCA	Legal research re: Piercing own veil.	1.50	450.00	\$675.00
01/21/2020	LAF	OCA	Legal research re: Action for harm to corporation belongs to the corporation.	0.80	450.00	\$360.00
01/21/2020	SWG	OCA	Continue research and memorandum.	8.90	625.00	\$5,562.50
01/22/2020	KHB	OCA	Emails from S. Golden re filing requirement for unincorporated association.	0.20	675.00	\$135.00
01/22/2020	KHB	OCA	Telephone call with S. Golden re filing requirement for unincorporated association.	0.20	675.00	\$135.00
01/22/2020	KHB	OCA	Review statue re filing requirement for unincorporated association	0.20	675.00	\$135.00
01/22/2020	KHB	OCA	Emails from J. Stang re re filing requirement for unincorporated association.	0.30	675.00	\$202.50
01/22/2020	KHB	OCA	Emails from G. Greenwood re document review.	0.20	675.00	\$135.00
01/22/2020	KHB	OCA	Confer with J. Stang re document review.	0.30	675.00	\$202.50
01/22/2020	KHB	OCA	Review authority on mixed intent re actual fraudulent transfers.	0.30	675.00	\$202.50
01/22/2020	KHB	OCA	Emails with C. Mackel re Catholic Foundation Financials.	0.20	675.00	\$135.00
01/22/2020	SWG	OCA	Continue research and memorandum.	9.00	625.00	\$5,625.00
01/23/2020	KHB	OCA	Work on memo re claims against Real Estate and DLF Trust.	4.00	675.00	\$2,700.00
01/23/2020	LAF	OCA	Legal research re: Corporation sole in New Mexico.	1.00	450.00	\$450.00
01/23/2020	LAF	OCA	Legal research re: Restatement of Trusts (3d) in New Mexico.	0.80	450.00	\$360.00
01/23/2020	SWG	OCA	Continue research and memorandum.	6.50	625.00	\$4,062.50
01/24/2020	SWG	OCA	Continue research and memorandum.	8.20	625.00	\$5,125.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/25/2020	SWG	OCA	Continue drafting and editing comprehensive memorandum regarding outgoing claims	4.60	625.00	\$2,875.00
01/27/2020	KHB	OCA	Work on analyze of claims against RE Trust and DCF Trust and analyze authority re same.	1.80	675.00	\$1,215.00
01/27/2020	SWG	OCA	Draft executive summary of memo.	0.60	625.00	\$375.00
01/27/2020	SWG	OCA	Continue editing memo regarding outbound claims.	0.50	625.00	\$312.50
01/28/2020	JIS	OCA	Telephone call with Ken Brown regarding litigation strategy for avoidance actions.	0.30	675.00	\$202.50
01/28/2020	JIS	OCA	Review research memo regarding avoidance action strategy.	1.50	675.00	\$1,012.50
01/28/2020	KHB	OCA	Work on memo analyzing claims against RE Trust and DLF Trust.	6.60	675.00	\$4,455.00
01/28/2020	KHB	OCA	Telephone call with J. Stang re memo analyzing claims against RE Trust and DLF Trust.	0.30	675.00	\$202.50
01/28/2020	SWG	OCA	Continue research regarding trust issues.	0.50	625.00	\$312.50
01/29/2020	JIS	OCA	Telephone call with Ken Brown regarding JIS comments on avoidance action memorandum.	0.60	675.00	\$405.00
01/29/2020	JIS	OCA	Draft memo regarding issue of transfer and parish incorporation.	0.30	675.00	\$202.50
01/29/2020	KHB	OCA	Emails with J. Stang re extension of avoidance reach back period and review authority re same.	0.30	675.00	\$202.50
01/29/2020	KHB	OCA	Telephone calls with J. Stang re extension of avoidance reach back period and review authority re same.	0.10	675.00	\$67.50
01/29/2020	KHB	OCA	Confer with J. Stang re analysis of claims against RE Trust and DCF Trust.	0.20	675.00	\$135.00
01/29/2020	KHB	OCA	Confer with J. Stang re claims against DCF and RE Trust and Catholic Foundation.	0.50	675.00	\$337.50
01/29/2020	KHB	OCA	Work on memo re claims against DLF and RE Trust.	4.70	675.00	\$3,172.50
01/30/2020	KHB	OCA	Work on memorandum analyzing estates claims against RE Trust and DLF Trust.	1.30	675.00	\$877.50
01/30/2020	SWG	OCA	Continue research re: outgoing claims.	2.90	625.00	\$1,812.50
				<b>238.10</b>		<b>\$155,185.00</b>

**Plan & Disclosure Stmt. [B320]**

01/02/2020	JIS	PD	Telephone call with Ilan Scharf regarding responses to interrogatories.	0.10	675.00	\$67.50
01/02/2020	JIS	PD	Draft cover letter for interrogatories.	0.70	675.00	\$472.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/02/2020	JIS	PD	Telephone call with mediator re status.	0.70	675.00	\$472.50
01/02/2020	JIS	PD	Telephone Ken Brown regarding mediation alternatives.	0.30	675.00	\$202.50
01/02/2020	IDS	PD	Review Jim Stang correspondence regarding mediation.	0.40	675.00	\$270.00
01/02/2020	IDS	PD	Telephone conference with Jim Stang regarding mediation.	0.30	675.00	\$202.50
01/03/2020	JIS	PD	State court counsel call regarding mediation and interrogatories.	1.00	675.00	\$675.00
01/06/2020	JIS	PD	Review annotation of Warburton billings and files that were submitted regarding insurance issues.	0.40	675.00	\$270.00
01/07/2020	JIS	PD	Meeting with Jeremy Richards re litigation options for "mission critical" real estate issues.	0.50	675.00	\$337.50
01/07/2020	JIS	PD	Draft email to FE regarding "mission critical" property (.5) and telephone conference with developer re status (.5).	1.00	675.00	\$675.00
01/15/2020	JIS	PD	Telephone call with state court counsel regarding confirmation standards and procedures.	1.10	675.00	\$742.50
01/16/2020	IDS	PD	Review responses/ objections regarding questions to POC forms in mediations.	2.50	675.00	\$1,687.50
01/20/2020	JIS	PD	telephone call with IScharf regarding call with mediator	0.40	675.00	\$270.00
01/20/2020	JIS	PD	review mediation memos	0.70	675.00	\$472.50
01/20/2020	IDS	PD	Review mediation/settlement analysis from B. Hall.	0.50	675.00	\$337.50
01/20/2020	IDS	PD	Review, analyze claims sheet in preparation for mediation.	1.60	675.00	\$1,080.00
01/21/2020	JIS	PD	Telephone call with mediator regarding upcoming insurance discussions.	0.80	675.00	\$540.00
01/21/2020	IDS	PD	Follow up claims analysis per B.Hall analysis.	0.60	675.00	\$405.00
01/24/2020	IDS	PD	Telephone conference with James I. Stang regarding SCC call, mediation	0.20	675.00	\$135.00
01/24/2020	IDS	PD	Call with SCC regarding mediation	0.50	675.00	\$337.50
01/27/2020	JIS	PD	Office conference with Robert Orgel re cramdown and best interests test for nonprofit entity.	0.40	675.00	\$270.00
01/28/2020	JIS	PD	Telephone call with Leo Papas regarding Debtor and insurers' counteroffer.	0.20	675.00	\$135.00
01/28/2020	JIS	PD	Telephone calls to state court counsel regarding settlement offer: Lisa Ford (.4); Brad Hall (.1); Vito De La Cruz (.0); Rothstein (.0).	0.50	675.00	\$337.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/28/2020	JIS	PD	Telephone call with mediator regarding settlement offer.	0.50	675.00	\$337.50
01/28/2020	IDS	PD	Telephone conference with James I. Stang regarding mediation	0.30	675.00	\$202.50
01/28/2020	IDS	PD	Telephone conference with James I. Stang regarding counter offer	0.30	675.00	\$202.50
01/28/2020	IDS	PD	Review insurance analysis and claim analysis for mediation prep	1.40	675.00	\$945.00
01/30/2020	JIS	PD	Conference call with Committee regarding mediation strategy.	0.70	675.00	\$472.50
01/30/2020	JIS	PD	Conference call with State Court Counsel regarding mediation strategy.	1.10	675.00	\$742.50
01/30/2020	IDS	PD	Telephone conference with SCC regarding counter offer in advance of Committee call	1.10	675.00	\$742.50
01/30/2020	IDS	PD	Telephone conference with B. Hall, James I. Stang regarding settlement counter	0.40	675.00	\$270.00
01/30/2020	IDS	PD	Review analysis of prior plan distributions	0.60	675.00	\$405.00
01/30/2020	IDS	PD	Call with committee regarding mediator	1.00	675.00	\$675.00
01/30/2020	IDS	PD	Telephone conference with James I. Stang regarding offer	0.40	675.00	\$270.00
01/30/2020	IDS	PD	Update charts and analysis regarding offer	0.60	675.00	\$405.00
01/30/2020	IDS	PD	Review pleadings and files from prior cases regarding settlement values (net after asset sales, claims scrubbing)	1.80	675.00	\$1,215.00
01/31/2020	JIS	PD	Conference call with State Court Counsel regarding mediation issues following committee meeting.	0.30	675.00	\$202.50
01/31/2020	JIS	PD	Email to mediator with Committee counteroffer.	0.10	675.00	\$67.50
01/31/2020	IDS	PD	Call with SCC regarding counter	1.00	675.00	\$675.00
				<b>27.00</b>		<b>\$18,225.00</b>

#### Stay Litigation [B140]

01/28/2020	JIS	SL	Telephone call with KC regarding stay application and relief to third party codefendant litigation.	0.10	675.00	\$67.50
				<b>0.10</b>		<b>\$67.50</b>

**TOTAL SERVICES FOR THIS MATTER:**

**\$198,857.50**

---

**Expenses**

01/07/2020	RE2	SCAN/COPY ( 4 @0.10 PER PG)	0.40
01/07/2020	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
01/07/2020	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
01/07/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
01/08/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.15
01/08/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.08
01/08/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	36.33
01/08/2020	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
01/09/2020	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
01/09/2020	RE2	SCAN/COPY ( 4 @0.10 PER PG)	0.40
01/10/2020	AF	Air Fare [E110] Southwest Airlines, Tkt. 5262158817382, from OAK to ABQ, ABQ to OAK, R. La Riva	267.96
01/10/2020	HT	Hotel Expense [E110] Marriott Albuquerque, 02/02/20-02/04/20, 2 nights, P. Romero	401.98
01/10/2020	LN	05066.00002 Lexis Charges for 01-10-20	11.79
01/10/2020	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
01/10/2020	RE2	SCAN/COPY ( 8 @0.10 PER PG)	0.80
01/10/2020	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60

---

01/10/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
01/10/2020	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
01/10/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
01/13/2020	AF	Air Fare [E110] American Airlines, Tkt. 00174900177222, from ABQ to LAX, IAWN	457.30
01/13/2020	AF	Air Fare [E110] United Airlines, Tkt. 01675109228251, from Jax to ORD, ORD to ABQ, ABQ to ORD, ORD to JAX, M. Lucero	483.40
01/13/2020	CC	Conference Call [E105] AT&T Conference Call, SWG	2.49
01/13/2020	RE2	SCAN/COPY ( 49 @0.10 PER PG)	4.90
01/13/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
01/13/2020	RE2	SCAN/COPY ( 23 @0.10 PER PG)	2.30
01/13/2020	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
01/13/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
01/13/2020	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
01/13/2020	RE2	SCAN/COPY ( 9 @0.10 PER PG)	0.90
01/13/2020	RE2	SCAN/COPY ( 19 @0.10 PER PG)	1.90
01/13/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
01/13/2020	RE2	SCAN/COPY ( 7 @0.10 PER PG)	0.70
01/13/2020	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20

---

01/13/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
01/13/2020	RE2	SCAN/COPY ( 19 @0.10 PER PG)	1.90
01/13/2020	RE2	SCAN/COPY ( 28 @0.10 PER PG)	2.80
01/13/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
01/13/2020	RE2	SCAN/COPY ( 8 @0.10 PER PG)	0.80
01/13/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
01/13/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
01/13/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
01/13/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
01/13/2020	RE2	SCAN/COPY ( 8 @0.10 PER PG)	0.80
01/13/2020	RE2	SCAN/COPY ( 4 @0.10 PER PG)	0.40
01/13/2020	RE2	SCAN/COPY ( 23 @0.10 PER PG)	2.30
01/13/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
01/13/2020	RE2	SCAN/COPY ( 18 @0.10 PER PG)	1.80
01/13/2020	RE2	SCAN/COPY ( 20 @0.10 PER PG)	2.00
01/13/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
01/13/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
01/13/2020	RE2	SCAN/COPY ( 40 @0.10 PER PG)	4.00



---

01/13/2020	RE2	SCAN/COPY ( 44 @0.10 PER PG)	4.40
01/13/2020	RE2	SCAN/COPY ( 9 @0.10 PER PG)	0.90
01/13/2020	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
01/13/2020	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
01/13/2020	RE2	SCAN/COPY ( 7 @0.10 PER PG)	0.70
01/13/2020	RE2	SCAN/COPY ( 7 @0.10 PER PG)	0.70
01/13/2020	RE2	SCAN/COPY ( 17 @0.10 PER PG)	1.70
01/13/2020	TE	Travel Expense [E110] Travel Agency Service Fee, IAWN	50.00
01/13/2020	TE	Travel Expense [E110] Travel Insurance, IDS	27.80
01/14/2020	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
01/14/2020	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
01/14/2020	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
01/14/2020	RE2	SCAN/COPY ( 50 @0.10 PER PG)	5.00
01/14/2020	RE2	SCAN/COPY ( 4 @0.10 PER PG)	0.40
01/14/2020	RE2	SCAN/COPY ( 2 @0.10 PER PG)	0.20
01/14/2020	RE2	SCAN/COPY ( 22 @0.10 PER PG)	2.20
01/14/2020	RE2	SCAN/COPY ( 34 @0.10 PER PG)	3.40
01/14/2020	RE2	SCAN/COPY ( 26 @0.10 PER PG)	2.60

---

01/15/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.45
01/15/2020	HT	Hotel Expense [E110] Albuquerque Marriott, 01/30/20-/02/05/20, 6 nights, M. Lucero	913.75
01/15/2020	RE2	SCAN/COPY ( 20 @0.10 PER PG)	2.00
01/15/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
01/15/2020	RE2	SCAN/COPY ( 7 @0.10 PER PG)	0.70
01/15/2020	RE2	SCAN/COPY ( 44 @0.10 PER PG)	4.40
01/15/2020	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
01/15/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
01/15/2020	RE2	SCAN/COPY ( 7 @0.10 PER PG)	0.70
01/15/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
01/15/2020	RE2	SCAN/COPY ( 44 @0.10 PER PG)	4.40
01/15/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
01/15/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
01/15/2020	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
01/15/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
01/15/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
01/15/2020	RE2	SCAN/COPY ( 7 @0.10 PER PG)	0.70
01/15/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40

---

01/15/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
01/15/2020	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
01/15/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
01/16/2020	HT	Hotel Expense [E110] Carlos Montoya, mileage to State Council meeting in Albuquerque, JIS	63.55
01/16/2020	HT	Hotel Expense [E110] Econo Lodge, 1 night, Carlos Montoya, JIS	63.55
01/16/2020	RE2	SCAN/COPY ( 23 @0.10 PER PG)	2.30
01/16/2020	TE	Travel Expense [E110] Carlos Montoya, mileage meeting with Brad Hall	401.36
01/17/2020	RE2	SCAN/COPY ( 8 @0.10 PER PG)	0.80
01/17/2020	RE2	SCAN/COPY ( 17 @0.10 PER PG)	1.70
01/17/2020	RE2	SCAN/COPY ( 9 @0.10 PER PG)	0.90
01/17/2020	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
01/17/2020	RE2	SCAN/COPY ( 23 @0.10 PER PG)	2.30
01/20/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
01/20/2020	RE2	SCAN/COPY ( 50 @0.10 PER PG)	5.00
01/20/2020	RE2	SCAN/COPY ( 9 @0.10 PER PG)	0.90
01/20/2020	RE2	SCAN/COPY ( 20 @0.10 PER PG)	2.00
01/21/2020	RE2	SCAN/COPY ( 8 @0.10 PER PG)	0.80

---

01/21/2020	RE2	SCAN/COPY ( 4 @0.10 PER PG)	0.40
01/21/2020	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
01/21/2020	RE2	SCAN/COPY ( 24 @0.10 PER PG)	2.40
01/21/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
01/21/2020	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60
01/21/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
01/21/2020	RE2	SCAN/COPY ( 21 @0.10 PER PG)	2.10
01/21/2020	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60
01/21/2020	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
01/21/2020	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
01/21/2020	RE2	SCAN/COPY ( 24 @0.10 PER PG)	2.40
01/21/2020	RE2	SCAN/COPY ( 17 @0.10 PER PG)	1.70
01/21/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
01/22/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	55.67
01/22/2020	RE2	SCAN/COPY ( 23 @0.10 PER PG)	2.30
01/22/2020	RE2	SCAN/COPY ( 28 @0.10 PER PG)	2.80
01/22/2020	RE2	SCAN/COPY ( 7 @0.10 PER PG)	0.70
01/22/2020	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60

---

01/22/2020	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
01/23/2020	AF	Air Fare [E110] Southwest Airlines, Tkt. 5262163963642, from LAX to ABQ, JIS	173.98
01/23/2020	RE2	SCAN/COPY ( 23 @0.10 PER PG)	2.30
01/23/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
01/23/2020	TE	Travel Expense [E110] Travel Agency Service Fee, JIS	50.00
01/24/2020	RE2	SCAN/COPY ( 45 @0.10 PER PG)	4.50
01/24/2020	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
01/24/2020	RE2	SCAN/COPY ( 4 @0.10 PER PG)	0.40
01/24/2020	TE	Travel Expense [E110] Travel Agency Service Fee, JIS	50.00
01/24/2020	TE	Travel Expense [E110] Southwest Airlines Fee, JIS	20.00
01/25/2020	AF	Air Fare [E110] american Airlines, Tkt. 00174954827714, from LAX to ABQ, ABQ to LAX, IAWN	347.40
01/27/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
01/27/2020	RE2	SCAN/COPY ( 41 @0.10 PER PG)	4.10
01/27/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
01/27/2020	RE2	SCAN/COPY ( 40 @0.10 PER PG)	4.00
01/28/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
01/28/2020	RE2	SCAN/COPY ( 40 @0.10 PER PG)	4.00

---

01/29/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	80.65
01/29/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.66
01/30/2020	AF	Air Fare [E110] Delta Airlines, Tkt. 0067492757985, from ABQ to LAX, JIS	180.10
01/30/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.60
01/30/2020	LN	05066.00002 Lexis Charges for 01-30-20	125.08
01/30/2020	RE2	SCAN/COPY ( 19 @0.10 PER PG)	1.90
01/30/2020	RE2	SCAN/COPY ( 36 @0.10 PER PG)	3.60
01/31/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	15.35
01/31/2020	RS	Research [E106] Everlaw, Inv. 23876	500.00
<b>Total Expenses for this Matter</b>			<b>\$4,949.13</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 01/31/2020**

**Total Fees \$198,857.50**

**Total Expenses 4,949.13**

**Total Due on Current Invoice \$203,806.63**

**Outstanding Balance from prior invoices as of 01/31/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$38,840.82
123345	09/30/2019	\$23,355.00	\$10.10	\$23,365.10
124730	10/31/2019	\$44,688.50	\$685.56	\$45,374.06
124933	11/30/2019	\$108,675.00	\$9,556.08	\$118,231.08
124949	12/31/2019	\$37,632.50	\$1,240.04	\$38,872.54

**Total Amount Due on Current and Prior Invoices: \$553,667.72**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

February 29, 2020

Invoice 125212

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 02/29/2020**

FEES	\$229,550.00
EXPENSES	\$5,024.17
<b>TOTAL CURRENT CHARGES</b>	<b>\$234,574.17</b>
<b>BALANCE FORWARD</b>	<b>\$553,667.72</b>
<b>TOTAL BALANCE DUE</b>	<b>\$788,241.89</b>



---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
CHM	Mackle, Cia H.	Counsel	675.00	1.60	\$1,080.00
GSG	Greenwood, Gail S.	Counsel	675.00	147.00	\$99,225.00
HDH	Hochman, Harry D.	Counsel	675.00	30.30	\$20,452.50
IAWN	Nasatir, Iain A. W.	Partner	337.50	8.00	\$2,700.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	16.60	\$11,205.00
IDS	Scharf, Ilan D.	Partner	337.50	20.00	\$6,750.00
IDS	Scharf, Ilan D.	Partner	675.00	24.90	\$16,807.50
JIS	Stang, James I.	Partner	337.50	9.00	\$3,037.50
JIS	Stang, James I.	Partner	675.00	29.80	\$20,115.00
KHB	Brown, Kenneth H.	Partner	675.00	43.10	\$29,092.50
LAF	Forrester, Leslie A.	Other	450.00	2.50	\$1,125.00
PJJ	Jeffries, Patricia J.	Paralegal	425.00	10.20	\$4,335.00
SWG	Golden, Steven W.	Associate	625.00	21.80	\$13,625.00
				<hr/> 364.80	<hr/> \$229,550.00

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.30	\$202.50
AD	Asset Disposition [B130]	1.00	\$675.00
BL	Bankruptcy Litigation [L430]	2.20	\$1,485.00
DO	Document Production	0.50	\$337.50
GC	General Creditors Comm. [B150]	1.50	\$1,012.50
IC	Insurance Coverage	5.80	\$3,915.00
OCA	Outgoing Claims Analysis	237.20	\$156,470.00
PD	Plan & Disclosure Stmt. [B320]	77.90	\$52,020.00
RPO	Ret. of Prof./Other	1.40	\$945.00
TR	Travel	37.00	\$12,487.50
		364.80	<hr/> \$229,550.00

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Air Fare [E110]	\$1,327.19
Auto Travel Expense [E109]	\$602.01
Working Meals [E111]	\$56.96
Conference Call [E105]	\$189.89
CourtLink	\$11.20
Hotel Expense [E110]	\$1,435.27
Lexis/Nexis- Legal Research [E	\$508.45
Reproduction/ Scan Copy	\$115.20
Research [E106]	\$500.00
Travel Expense [E110]	\$278.00
	<hr/>
	\$5,024.17

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
02/13/2020	IDS	AA	Email to B. Anderson regarding art appraisal.	0.30	675.00	\$202.50
				<b>0.30</b>		<b>\$202.50</b>
<b>Asset Disposition [B130]</b>						
02/11/2020	JIS	AD	Email to developer group about Archdiocese response to purchase offer.	0.40	675.00	\$270.00
02/26/2020	JIS	AD	Telephone call with Ed Mazel re real property sales.	0.60	675.00	\$405.00
				<b>1.00</b>		<b>\$675.00</b>
<b>Bankruptcy Litigation [L430]</b>						
02/05/2020	KHB	BL	Work on avoidance / declaratory relief complaints and standing motions.	2.20	675.00	\$1,485.00
				<b>2.20</b>		<b>\$1,485.00</b>
<b>Document Production</b>						
02/03/2020	CHM	DO	Compile financials and appraisals and email to I. Scharf.	0.50	675.00	\$337.50
				<b>0.50</b>		<b>\$337.50</b>
<b>General Creditors Comm. [B150]</b>						
02/11/2020	JIS	GC	Telephone call with Brad Hall regarding real property issues and mediation issues.	0.60	675.00	\$405.00
02/11/2020	JIS	GC	Draft status report to committee.	0.40	675.00	\$270.00
02/14/2020	JIS	GC	State Court Counsel call regarding case status.	0.40	675.00	\$270.00
02/21/2020	JIS	GC	Telephone call with survivor regarding case status.	0.10	675.00	\$67.50
				<b>1.50</b>		<b>\$1,012.50</b>
<b>Insurance Coverage</b>						
02/01/2020	IAWN	IC	Review emails referencing audit, review audit, exchange emails with James I Stang re Catholic pool (1.2); continue preparation for mediation re insurance (2.3)	3.50	675.00	\$2,362.50
02/02/2020	IAWN	IC	Prepare for mediation, exchange emails with James I Stang, Papas, Murray re same, etc.	1.00	675.00	\$675.00
02/19/2020	IAWN	IC	Receive ADSF documents via drop box and review same summarily	1.30	675.00	\$877.50

				5.80		\$3,915.00
<b>Outgoing Claims Analysis</b>						
01/07/2020	GSG	OCA	Call with K. Brown and C. Mackle re database and document review.	0.20	675.00	\$135.00
01/07/2020	GSG	OCA	Review and tag documents from second production.	3.00	675.00	\$2,025.00
01/09/2020	GSG	OCA	Review ADSF documents from third production; review and tag issues.	7.90	675.00	\$5,332.50
01/19/2020	GSG	OCA	Review CHM memo re Catholic Foundation and incorporate facts to transfer memo (1.1); review SWG email re legal arguments and cases re resulting trusts (.6).	1.70	675.00	\$1,147.50
01/20/2020	GSG	OCA	Draft legal memo and circulate preliminary draft.	8.50	675.00	\$5,737.50
01/21/2020	GSG	OCA	Telephone call with K. Brown and J. Stang re fraudulent transfer analysis.	0.30	675.00	\$202.50
01/21/2020	GSG	OCA	Review database and email J. Stang re prior productions.	0.40	675.00	\$270.00
01/21/2020	GSG	OCA	Review cases and law re 544(b) and federal statutes of limitations.	1.90	675.00	\$1,282.50
01/21/2020	GSG	OCA	Revise memo re evidentiary proof and citations; draft / revise memo re S/L.	6.30	675.00	\$4,252.50
01/21/2020	GSG	OCA	Call with J. Stang re Dropbox and documents.	0.30	675.00	\$202.50
01/21/2020	GSG	OCA	Confer with C. Mackle re Dropbox and database.	0.20	675.00	\$135.00
01/22/2020	GSG	OCA	Emails re Dropbox and confer with C. Mackle re database.	0.20	675.00	\$135.00
01/22/2020	GSG	OCA	Review additional documents produced by ADSF.	0.80	675.00	\$540.00
01/22/2020	GSG	OCA	Research re mixed intent and review memo re same.	0.50	675.00	\$337.50
01/22/2020	GSG	OCA	Research / review cases re NM fraudulent transfer analysis.	3.50	675.00	\$2,362.50
01/22/2020	GSG	OCA	Telephone call with S. Golden re fraudulent transfer analysis.	0.50	675.00	\$337.50
01/22/2020	GSG	OCA	Draft / revise memo re fraudulent transfer analysis.	2.30	675.00	\$1,552.50
01/23/2020	GSG	OCA	Review database re supplemental production; tag documents and prepare chronology re critical documents.	7.10	675.00	\$4,792.50
01/23/2020	GSG	OCA	Call with K. Brown and S. Golden re synthesis of legal arrangements.	0.20	675.00	\$135.00
01/23/2020	GSG	OCA	Calls with S. Golden [(.)2, (.5), (.2)] re legal memo, additional facts, and synthesis of facts / law.	0.90	675.00	\$607.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/23/2020	GSG	OCA	Review database re DLF funding and excess fund demands.	1.10	675.00	\$742.50
01/23/2020	GSG	OCA	Draft / revise memo re factual background.	2.20	675.00	\$1,485.00
01/24/2020	GSG	OCA	Emails re updated chronology re restructuring discussions.	0.20	675.00	\$135.00
01/24/2020	GSG	OCA	Confer with S. Golden re status and consolidation of memo.	0.10	675.00	\$67.50
01/24/2020	GSG	OCA	Draft / revise additional facts re memo (3.6); review / revise cites and legal arguments (2.9).	6.50	675.00	\$4,387.50
01/26/2020	GSG	OCA	Confer with S. Golden re consolidated memo.	0.20	675.00	\$135.00
01/26/2020	GSG	OCA	Review S. Golden legal arguments re 544(a)(3) and alter ego analysis.	0.80	675.00	\$540.00
01/26/2020	GSG	OCA	Revise legal memo re structure / facts / analysis.	4.60	675.00	\$3,105.00
01/27/2020	GSG	OCA	Draft / revise legal memo re avoidance claims.	4.50	675.00	\$3,037.50
01/27/2020	GSG	OCA	Draft / revise executive summary re legal memo.	4.10	675.00	\$2,767.50
01/27/2020	GSG	OCA	Confer with S. Golden re legal memo and outstanding issues.	0.30	675.00	\$202.50
01/28/2020	GSG	OCA	Review additional cases re inquiry notice under 544(a)(3).	0.30	675.00	\$202.50
01/28/2020	GSG	OCA	Revise memo re K. Brown comments.	1.30	675.00	\$877.50
01/28/2020	GSG	OCA	Research database and review deeds re identity of ADSF property list.	2.60	675.00	\$1,755.00
01/29/2020	HDH	OCA	Research RFRA	1.50	675.00	\$1,012.50
01/29/2020	GSG	OCA	Emails and call re revisions to legal memo.	0.60	675.00	\$405.00
01/30/2020	HDH	OCA	Research potential confirmation issues/RFRA; Draft memo	5.50	675.00	\$3,712.50
01/30/2020	GSG	OCA	Emails re supporting documents to legal memo.	0.20	675.00	\$135.00
01/31/2020	HDH	OCA	Research and drafting of memo regarding RFRA/Plan issues	8.20	675.00	\$5,535.00
02/03/2020	KHB	OCA	Email from J. Stang re authority on unincorporated assignments and review new authority.	1.00	675.00	\$675.00
02/03/2020	GSG	OCA	Research / review additional case law re church bankruptcies.	2.80	675.00	\$1,890.00
02/03/2020	SWG	OCA	Continue research/ drafting regarding outbound claims issues.	3.00	625.00	\$1,875.00
02/04/2020	CHM	OCA	Upload new financials to Everlaw, review and email G. Greenwood re same.	0.50	675.00	\$337.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/04/2020	GSG	OCA	Pull and tag financials; confer with LAM re supplement to database.	0.40	675.00	\$270.00
02/04/2020	GSG	OCA	Search and update database re financials and appraisals.	0.50	675.00	\$337.50
02/04/2020	SWG	OCA	Review and summarize case regarding outbound claims.	1.10	625.00	\$687.50
02/05/2020	JIS	OCA	Telephone call Ken Brown regarding mediation status and avoidance action standing motion.	0.30	675.00	\$202.50
02/05/2020	KHB	OCA	Telephone call with J. Stang re results of mediation and litigation strategy.	0.30	675.00	\$202.50
02/05/2020	GSG	OCA	Review database re DLF trust.	0.70	675.00	\$472.50
02/05/2020	GSG	OCA	Research re standing motions and preliminary arguments re strong arm powers.	0.90	675.00	\$607.50
02/05/2020	SWG	OCA	Research regarding outgoing claims.	0.90	625.00	\$562.50
02/06/2020	JIS	OCA	Review and respond to emails regarding reach back period for avoidance of restructuring program.	0.20	675.00	\$135.00
02/06/2020	JIS	OCA	Review case regarding notice afforded by recorded deed.	0.30	675.00	\$202.50
02/06/2020	KHB	OCA	Confer with G. Greenwood re fraudulent transfer claims.	0.20	675.00	\$135.00
02/06/2020	KHB	OCA	Emails with G. Greenwood and J. Stang re fraudulent transfer claims.	0.20	675.00	\$135.00
02/06/2020	KHB	OCA	Confer with G. Greenwood re standing motion.	0.10	675.00	\$67.50
02/06/2020	KHB	OCA	Work on complaints and standing motions.	2.30	675.00	\$1,552.50
02/06/2020	GSG	OCA	Research 10th Circuit caselaw re 544(b)(1).	0.70	675.00	\$472.50
02/06/2020	GSG	OCA	Research 10th Circuit caselaw re derivative standing and standards.	1.00	675.00	\$675.00
02/06/2020	GSG	OCA	Draft brief position re derivative standing.	0.50	675.00	\$337.50
02/06/2020	GSG	OCA	Review state court docket re Doe claims and timing re petition; email re same.	0.60	675.00	\$405.00
02/06/2020	GSG	OCA	Follow-up review of docket re status of additional complaints.	0.30	675.00	\$202.50
02/06/2020	GSG	OCA	Research NM cases re UFTA statute of limitations / statute of repose and application to fraud claims.	3.40	675.00	\$2,295.00
02/06/2020	GSG	OCA	Review UMB briefing re S/L.	0.70	675.00	\$472.50
02/06/2020	GSG	OCA	Call with SWG re standing motion and complaints.	0.30	675.00	\$202.50
02/07/2020	KHB	OCA	Review email from J. Stang re Cemetery assignment contribution to settlement and request for	0.10	675.00	\$67.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			documents.			
02/07/2020	GSG	OCA	Research re inquiry notice re fraud under NM law.	3.70	675.00	\$2,497.50
02/07/2020	GSG	OCA	Draft standing motion.	2.30	675.00	\$1,552.50
02/10/2020	KHB	OCA	Emails from G. Greenwood re SOL issues relating to fraudulent transfer claims against Real Estate Trust.	0.30	675.00	\$202.50
02/10/2020	KHB	OCA	Work on fraudulent transfer complaint against Real Estate Trust.	4.30	675.00	\$2,902.50
02/10/2020	GSG	OCA	Draft standing motion re S/L issues.	3.50	675.00	\$2,362.50
02/10/2020	GSG	OCA	Research and draft standing motion re colorable claims.	1.60	675.00	\$1,080.00
02/10/2020	GSG	OCA	Telephone call with S. Golden re motion status.	0.20	675.00	\$135.00
02/10/2020	SWG	OCA	Draft section of standing motion.	3.00	625.00	\$1,875.00
02/10/2020	SWG	OCA	Committee research/memorandum regarding outbound claims.	4.80	625.00	\$3,000.00
02/11/2020	JIS	OCA	Telephone call with Ken Brown regarding avoidance action complaints and standing demand letters.	0.40	675.00	\$270.00
02/11/2020	KHB	OCA	Confer with J. Stang re self-settled trust analysis.	0.20	675.00	\$135.00
02/11/2020	KHB	OCA	Work on complaint to avoid transfers to Real Estate Trust.	6.00	675.00	\$4,050.00
02/11/2020	KHB	OCA	Work on standing letter to Debtor's counsel.	0.20	675.00	\$135.00
02/11/2020	GSG	OCA	Research re standing and unjustified refusal to pursue litigation under 10th Circuit; draft motion re same.	4.70	675.00	\$3,172.50
02/11/2020	GSG	OCA	Review K. Brown complaint re Real Estate Trust and prepare comments.	3.60	675.00	\$2,430.00
02/11/2020	SWG	OCA	Draft/ edit section of standing memo.	0.30	625.00	\$187.50
02/11/2020	SWG	OCA	Continue research / drafting memo regarding outbound claims.	3.50	625.00	\$2,187.50
02/12/2020	KHB	OCA	Confer with G. Greenwood re complaint against Real Estate Trust.	0.20	675.00	\$135.00
02/12/2020	KHB	OCA	Work on complaint.	0.30	675.00	\$202.50
02/12/2020	KHB	OCA	Review memo and authority challenging self settled trusts.	1.30	675.00	\$877.50
02/12/2020	KHB	OCA	Work on complaints to avoid unrecorded interests in real property.	0.80	675.00	\$540.00
02/12/2020	KHB	OCA	Work on complaint to avoid transfers to Real Estate Trust and challenge Self-Settled Trust.	1.70	675.00	\$1,147.50
02/12/2020	GSG	OCA	Review SWG memo re self -settled trusts and add	1.00	675.00	\$675.00



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			supporting facts.			
02/12/2020	GSG	OCA	Confer with K. Brown and P. Jeffries re schedules and preparation of exhibits re trust transfers.	0.70	675.00	\$472.50
02/12/2020	GSG	OCA	Review Real Estate complaint re fraud specificity, etc.; blackline and circulate for further comments.	4.60	675.00	\$3,105.00
02/12/2020	SWG	OCA	Continue research /drafting of outbound claims memo.	1.50	625.00	\$937.50
02/12/2020	SWG	OCA	Review/edit proposed 544(a)(3) complaint.	0.60	625.00	\$375.00
02/13/2020	KHB	OCA	Work on complaint to avoid transfers to Real Estate Trust.	3.80	675.00	\$2,565.00
02/13/2020	KHB	OCA	Work on standing demand letter to Debtor's counsel.	3.00	675.00	\$2,025.00
02/13/2020	GSG	OCA	Draft standing motion re self-settled trust claim's etc.	4.60	675.00	\$3,105.00
02/13/2020	GSG	OCA	Review Real Estate Trust complaint; revise complaint re factual details and emails re comments.	1.10	675.00	\$742.50
02/13/2020	GSG	OCA	Review NM LBR re motions, hearings, and courtroom procedures.	0.40	675.00	\$270.00
02/14/2020	KHB	OCA	Work on complaints to recover assets transfered to Trusts.	0.60	675.00	\$405.00
02/14/2020	GSG	OCA	Review available deeds re transfers to trust; prepare chart re same.	1.90	675.00	\$1,282.50
02/14/2020	GSG	OCA	Revise Real Estate Trust complaint re additional comments.	0.50	675.00	\$337.50
02/14/2020	GSG	OCA	Review additional deeds re transfers from trust to third parties.	0.50	675.00	\$337.50
02/17/2020	KHB	OCA	Prepare demand letter to Debtor's counsel for standing to prosecute fraudulent transfer claims.	3.50	675.00	\$2,362.50
02/17/2020	KHB	OCA	Examine authority re necessary parties to challenge trust.	0.50	675.00	\$337.50
02/17/2020	KHB	OCA	Confer with J. Stang re complaints and demand letter.	0.10	675.00	\$67.50
02/17/2020	KHB	OCA	Confer with G. Greenwood re complaints and demand letters.	0.20	675.00	\$135.00
02/17/2020	KHB	OCA	Work on complaints to determine property of estate.	0.30	675.00	\$202.50
02/17/2020	GSG	OCA	Emails re complaint issues.	0.20	675.00	\$135.00
02/17/2020	GSG	OCA	Review Montana decision re standing; email comments re service.	0.50	675.00	\$337.50
02/17/2020	GSG	OCA	Review demand letter and emails.	0.40	675.00	\$270.00
02/17/2020	GSG	OCA	Pull documents and prepare comments re demand	0.70	675.00	\$472.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			letter.			
02/17/2020	GSG	OCA	Review petition re pending litigation and triggering creditors; review dockets re same.	1.20	675.00	\$810.00
02/17/2020	GSG	OCA	Telephone call with K. Brown re complaints and additional causes of action.	0.20	675.00	\$135.00
02/18/2020	KHB	OCA	Confer with G. Greenwood re fraudulent transfer complaints.	0.20	675.00	\$135.00
02/18/2020	KHB	OCA	Work on fraudulent transfer complaint against Real Estate Trust.	1.20	675.00	\$810.00
02/18/2020	PJJ	OCA	Review, analyze and create tracking chart of transferred properties.	6.40	425.00	\$2,720.00
02/18/2020	GSG	OCA	Revise Real Estate Trust complaint re additional claims and creditor.	2.50	675.00	\$1,687.50
02/18/2020	GSG	OCA	Review database re DLF status and trustees.	0.80	675.00	\$540.00
02/18/2020	GSG	OCA	Confer with S. Golden re complaint status.	0.30	675.00	\$202.50
02/18/2020	GSG	OCA	Review Doe / docket re state court claims and trial issues.	0.30	675.00	\$202.50
02/18/2020	GSG	OCA	Draft DLF trust complaint.	4.80	675.00	\$3,240.00
02/18/2020	SWG	OCA	Review proposed complaints and edit.	1.70	625.00	\$1,062.50
02/19/2020	CHM	OCA	Upload newly produced documents to Everlaw and email G. Greenwood re same.	0.30	675.00	\$202.50
02/19/2020	KHB	OCA	Work on complaints against DLF Trust and Real Estate Trust and demand letter to Debtor's counsel.	2.50	675.00	\$1,687.50
02/19/2020	PJJ	OCA	Continue work on real property transfer analysis.	2.30	425.00	\$977.50
02/19/2020	GSG	OCA	Revise / DLF complaint.	0.50	675.00	\$337.50
02/19/2020	GSG	OCA	Review creditor complaints and review docket re timing and filing of lawsuits against ASF.	1.60	675.00	\$1,080.00
02/19/2020	GSG	OCA	Research database re additional DLF facts re intentional fraud.	0.60	675.00	\$405.00
02/19/2020	GSG	OCA	Final review and comments to three complaints and demand letter.	1.50	675.00	\$1,012.50
02/19/2020	GSG	OCA	Review spreadsheet re Real Estate Trust transfers and comments re same.	1.20	675.00	\$810.00
02/19/2020	GSG	OCA	Review ASF deeds to third parties and compare re spreadsheet; confer with PJ re same.	0.90	675.00	\$607.50
02/19/2020	GSG	OCA	Further revisions to demand re request for documents / corrections.	0.50	675.00	\$337.50
02/19/2020	GSG	OCA	Preliminary review of additional Dropbox contents;	0.30	675.00	\$202.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			emails re same.			
02/19/2020	SWG	OCA	Research issues regarding defendants in adversaries.	1.00	625.00	\$625.00
02/20/2020	KHB	OCA	Work on standing demand letter.	0.30	675.00	\$202.50
02/20/2020	KHB	OCA	Emails re new documents procedures.	0.30	675.00	\$202.50
02/20/2020	KHB	OCA	Work on complaints against Real Estate Trust and DLF Trust.	2.00	675.00	\$1,350.00
02/20/2020	PJJ	OCA	Further revise property transfer analysis.	1.00	425.00	\$425.00
02/20/2020	GSG	OCA	Review parish holdings and available values re 544(a)(3) claims.	0.40	675.00	\$270.00
02/20/2020	GSG	OCA	Confer with M. Renck re aggregation of property values (.2); review preliminary spreadsheet and parish values.	0.40	675.00	\$270.00
02/20/2020	SWG	OCA	Continued research regarding necessary debtors.	0.40	625.00	\$250.00
02/21/2020	CHM	OCA	Review email from G. Greenwood re dropbox, review files and reply.	0.30	675.00	\$202.50
02/21/2020	KHB	OCA	Confer with J. Stang re revisions to fraudulent transfer complaints.	0.10	675.00	\$67.50
02/21/2020	KHB	OCA	Confer with J. Stang re demand letter re standing.	0.20	675.00	\$135.00
02/21/2020	KHB	OCA	Work on demand letter.	0.80	675.00	\$540.00
02/21/2020	KHB	OCA	Confer with Ford Elaesser re standing letter.	0.50	675.00	\$337.50
02/21/2020	PJJ	OCA	Further revise real property transfer analysis.	0.50	425.00	\$212.50
02/21/2020	GSG	OCA	Review Doc. to complaint and revise complaints.	0.30	675.00	\$202.50
02/21/2020	GSG	OCA	Email K. Brown re unrecorded property values and spreadsheet.	0.20	675.00	\$135.00
02/23/2020	KHB	OCA	Work on complaints and demand letter for standing.	0.80	675.00	\$540.00
02/24/2020	KHB	OCA	Email from Debtor's counsel re standing letter.	0.10	675.00	\$67.50
02/24/2020	GSG	OCA	Revise Real Estate Trust complaint re total transfers; review exhibit re same.	0.30	675.00	\$202.50
02/24/2020	GSG	OCA	Review unrecorded property interest complaint re parish defendants; review Secretary of State records re parishes.	0.70	675.00	\$472.50
02/24/2020	GSG	OCA	Confer with K. Brown re 2018 property list and Real Estate Trust Transfers.	0.20	675.00	\$135.00
02/24/2020	GSG	OCA	Email re representative parishes re Real Estate Trust Transfers.	0.10	675.00	\$67.50
02/25/2020	GSG	OCA	Review and tag supplemental production of documents by ASF.	1.40	675.00	\$945.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/26/2020	KHB	OCA	Emails from State Court Counsel re Debtor's response to standing demand letter.	0.20	675.00	\$135.00
				<b>237.20</b>		<b>\$156,470.00</b>

**Plan & Disclosure Stmt. [B320]**

01/15/2020	HDH	PD	Research best interests test issues	1.60	675.00	\$1,080.00
01/16/2020	HDH	PD	Research best interest issues; correspondence to James I. Stang regarding same	1.20	675.00	\$810.00
02/01/2020	HDH	PD	Research RFRA issue	4.40	675.00	\$2,970.00
02/01/2020	IAWN	PD	Review RFRA memo	0.70	675.00	\$472.50
02/02/2020	HDH	PD	Research and drafting of memo regarding RFRA / plan issue	5.80	675.00	\$3,915.00
02/02/2020	IDS	PD	Review claims chart and prepare reviewed analysis for mediation.	2.00	675.00	\$1,350.00
02/03/2020	HDH	PD	Research N.M. RFRA	0.60	675.00	\$405.00
02/03/2020	IAWN	PD	Attend meeting with SCC (1.5), attend mediation (8.0) (exchange emails and office conferences with Murray re Catholic pool)	9.50	675.00	\$6,412.50
02/03/2020	JIS	PD	Review Dropbox materials for financial data on Cemetery Assn, Catholic Foundation and appraisals for St. Pius school, Chancery and Retreat Center.	1.20	675.00	\$810.00
02/03/2020	JIS	PD	Attend mediation.	11.00	675.00	\$7,425.00
02/03/2020	LAF	PD	Legal research re: Spendthrift trusts.	0.50	450.00	\$225.00
02/03/2020	IDS	PD	Meet with SCC, Committee following mediation.	2.50	675.00	\$1,687.50
02/03/2020	IDS	PD	Attend mediation.	11.00	675.00	\$7,425.00
02/03/2020	IDS	PD	Meet with Jim Stang regarding mediation.	1.00	675.00	\$675.00
02/04/2020	JIS	PD	Attend mediation.	7.50	675.00	\$5,062.50
02/04/2020	IDS	PD	Meet with Jim Stang regarding mediation.	1.00	675.00	\$675.00
02/04/2020	IDS	PD	Attend mediation.	6.50	675.00	\$4,387.50
02/05/2020	HDH	PD	Conference with James I. Stang regarding memo issues (.2); Begin revising memo (.4)	0.60	675.00	\$405.00
02/06/2020	JIS	PD	Telephone call with Brad Hall and Levi Monagle regarding mediation procedures.	0.10	675.00	\$67.50
02/06/2020	JIS	PD	Draft email to Archdiocese regarding Committee's post-mediation expectations (.5); draft email to R Charles regarding Cemetery operations including review of Cemetery Association document production (1.1).	1.60	675.00	\$1,080.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/07/2020	JIS	PD	Conference call with state court counsel regarding next steps in mediation.	0.50	675.00	\$337.50
02/07/2020	JIS	PD	Google review of property for letter to Debtor re mediation follow up and finalize letter to Debtor.	0.60	675.00	\$405.00
02/10/2020	HDH	PD	Revise memo regarding best interests test and RFRA	0.90	675.00	\$607.50
02/10/2020	JIS	PD	Review changes to RFRA research memo.	0.20	675.00	\$135.00
02/10/2020	KHB	PD	Review emails from J. Stang re status of mediation.	0.20	675.00	\$135.00
02/10/2020	LAF	PD	Legal research re: Revocable trusts.	1.50	450.00	\$675.00
02/11/2020	LAF	PD	Legal research re: Irrevocable trusts.	0.50	450.00	\$225.00
02/14/2020	IDS	PD	SCC call regarding mediation follow up	0.50	675.00	\$337.50
02/14/2020	IDS	PD	Telephone conference with Jim Stang regarding mediation.	0.10	675.00	\$67.50
02/21/2020	JIS	PD	Telephone call with Brad Hall and Leo Papas regarding mediation issues.	0.80	675.00	\$540.00
02/24/2020	IAWN	PD	Review PSZJ letter to Ford (.2), exchange office conferences and emails with James I Stang re mediation number (.2)	0.40	675.00	\$270.00
02/25/2020	JIS	PD	Telephone call with Brad Hall regarding mediation issues.	0.20	675.00	\$135.00
02/27/2020	IAWN	PD	Review Papas email re mediation and James I Stang emails re same	0.20	675.00	\$135.00
02/28/2020	JIS	PD	Conference call with State Court Counsel regarding mediation.	1.00	675.00	\$675.00
				<b>77.90</b>		<b>\$52,020.00</b>

**Ret. of Prof./Other**

02/07/2020	JIS	RPO	Telephone call with prospective appraiser for Santa Fe properties.	0.70	675.00	\$472.50
02/25/2020	JIS	RPO	Draft email to J. Hanus regarding appraisal project.	0.20	675.00	\$135.00
02/25/2020	JIS	RPO	Email to R. Alfred regarding appraisal project.	0.20	675.00	\$135.00
02/28/2020	JIS	RPO	Review appraisal proposal and forward IHRC info to appraiser.	0.30	675.00	\$202.50
				<b>1.40</b>		<b>\$945.00</b>

**Travel**

02/02/2020	IAWN	TR	Travel to Albuquerque (billed at 1/2 rate)	4.00	337.50	\$1,350.00
02/02/2020	JIS	TR	Travel to Albuquerque, New Mexico from Los	4.50	337.50	\$1,518.75

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 15  
Invoice 125212  
February 29, 2020

---

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Angeles for mediation (billed at 1/2 rate)						
02/02/2020	IDS	TR	Travel to Albuquerque from NY (billed at 1/2 rate).	10.00	337.50	\$3,375.00
02/03/2020	IAWN	TR	Travel back to Los Angeles (billed at 1/2 rate)	4.00	337.50	\$1,350.00
02/04/2020	JIS	TR	Travel from Albuquerque, New Mexico to Los Angeles from mediation (billed at 1/2 rate)	4.50	337.50	\$1,518.75
02/05/2020	IDS	TR	Travel from Albuquerque to NY (billed at 1/2 rate)	10.00	337.50	\$3,375.00
				<u>37.00</u>		<u>\$12,487.50</u>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$229,550.00</b>

---

**Expenses**

02/02/2020	AT	Auto Travel Expense [E109] Airport transportation Service, IAWN	180.00
02/02/2020	BM	Business Meal [E111] Chevron, Meal Expense, C. Montoya	12.57
02/02/2020	BM	Business Meal [E111] Pizza 9 (Eubank), Meal Expense, C. Montoya	24.53
02/02/2020	BM	Business Meal [E111] Sonic, Meal Expense, C. Montoya	6.35
02/02/2020	LN	05066.00002 Lexis Charges for 02-02-20	22.47
02/03/2020	AT	Auto Travel Expense [E109] Airport transportation Service, IAWN	90.00
02/03/2020	AT	Auto Travel Expense [E109] Cynthia's Taxi, IAWN	42.13
02/03/2020	AT	Auto Travel Expense [E109] Uber Transportation Services, JIS	19.43
02/03/2020	BM	Business Meal [E111] Chevron, Meal Expense, C. Montoya	9.32
02/03/2020	BM	Business Meal [E111] Taco Bell, Meal Expense, C. Montoya	4.19
02/03/2020	CL	05066.00002 CourtLink charges for 02-03-20	11.20
02/03/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
02/03/2020	RE2	SCAN/COPY ( 23 @0.10 PER PG)	2.30
02/03/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
02/03/2020	RE2	SCAN/COPY ( 30 @0.10 PER PG)	3.00
02/04/2020	AT	Auto Travel Expense [E109] Uber Transportation Services,	19.60

---

IDS			
02/04/2020	HT	Hotel Expense [E110] Marriott Albuquerque, 02/02/20-02/03/20, 1 night, IAWN	362.98
02/05/2020	AT	Auto Travel Expense [E109] Thrifty Car Rental, R. La Riva	106.37
02/05/2020	AT	Auto Travel Expense [E109] Uber Transportation Services, JIS	18.31
02/05/2020	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	12.45
02/05/2020	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	13.12
02/05/2020	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	18.08
02/05/2020	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	12.09
02/05/2020	HT	Hotel Expense [E110] Econo Lodge Inn & suites, 02/02/20-02/05/20, 4 nights, C. Montoya	190.65
02/05/2020	HT	Hotel Expense [E110] Marriott Albuquerque, 02/02/20-02/04/20, 2 nights, JIS	436.56
02/05/2020	HT	Hotel Expense [E110] Marriott Albuquerque Hotel Tax, JIS	7.70
02/05/2020	HT	Hotel Expense [E110] Doubletree Albuquerque, 02/02/20-02/05/20, 3 nights, IDS	437.38
02/05/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
02/05/2020	RE2	SCAN/COPY ( 9 @0.10 PER PG)	0.90
02/05/2020	TE	Travel Expense [E110] LAX Airport Parking Fee, JIS	89.00



---

02/06/2020	AF	Air Fare [E110] Delta Airlines, Tkt. 00624176022315, from LGA to ATL, ATL to ABQ, ABQ to ATL, ATL to LGA, IDS	685.00
02/06/2020	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	5.00
02/06/2020	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	31.30
02/06/2020	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
02/06/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
02/06/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
02/06/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
02/06/2020	RE2	SCAN/COPY ( 8 @0.10 PER PG)	0.80
02/06/2020	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
02/06/2020	RE2	SCAN/COPY ( 24 @0.10 PER PG)	2.40
02/06/2020	RE2	SCAN/COPY ( 9 @0.10 PER PG)	0.90
02/06/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
02/07/2020	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	28.56
02/07/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	32.63
02/07/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.07
02/07/2020	LN	05066.00002 Lexis Charges for 02-07-20	12.87

---

02/07/2020	RE2	SCAN/COPY ( 7 @0.10 PER PG)	0.70
02/07/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
02/07/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
02/07/2020	RE2	SCAN/COPY ( 8 @0.10 PER PG)	0.80
02/08/2020	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	5.57
02/09/2020	TE	Travel Expense [E110] Delta Airlines.Additional Collection Fee, IDS	89.00
02/10/2020	LN	05066.00002 Lexis Charges for 02-10-20	103.49
02/10/2020	LN	05066.00002 Lexis Charges for 02-10-20	314.60
02/10/2020	LN	05066.00002 Lexis Charges for 02-10-20	12.87
02/10/2020	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
02/10/2020	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60
02/10/2020	RE2	SCAN/COPY ( 26 @0.10 PER PG)	2.60
02/10/2020	RE2	SCAN/COPY ( 42 @0.10 PER PG)	4.20
02/10/2020	RE2	SCAN/COPY ( 30 @0.10 PER PG)	3.00
02/11/2020	RE2	SCAN/COPY ( 22 @0.10 PER PG)	2.20
02/11/2020	RE2	SCAN/COPY ( 17 @0.10 PER PG)	1.70
02/11/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50

---

02/11/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
02/12/2020	RE2	SCAN/COPY ( 17 @0.10 PER PG)	1.70
02/12/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
02/12/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
02/12/2020	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
02/12/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
02/12/2020	RE2	SCAN/COPY ( 47 @0.10 PER PG)	4.70
02/12/2020	RE2	SCAN/COPY ( 63 @0.10 PER PG)	6.30
02/13/2020	LN	05066.00002 Lexis Charges for 02-13-20	12.87
02/13/2020	RE2	SCAN/COPY ( 20 @0.10 PER PG)	2.00
02/13/2020	RE2	SCAN/COPY ( 156 @0.10 PER PG)	15.60
02/14/2020	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
02/14/2020	RE2	SCAN/COPY ( 21 @0.10 PER PG)	2.10
02/18/2020	LN	05066.00002 Lexis Charges for 02-18-20	14.64
02/18/2020	RE2	SCAN/COPY ( 24 @0.10 PER PG)	2.40
02/18/2020	RE2	SCAN/COPY ( 8 @0.10 PER PG)	0.80
02/18/2020	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
02/18/2020	RE2	SCAN/COPY ( 23 @0.10 PER PG)	2.30

---

02/18/2020	RE2	SCAN/COPY ( 25 @0.10 PER PG)	2.50
02/18/2020	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
02/18/2020	RE2	SCAN/COPY ( 22 @0.10 PER PG)	2.20
02/18/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
02/19/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
02/19/2020	RE2	SCAN/COPY ( 30 @0.10 PER PG)	3.00
02/19/2020	RE2	SCAN/COPY ( 4 @0.10 PER PG)	0.40
02/19/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
02/19/2020	RE2	SCAN/COPY ( 63 @0.10 PER PG)	6.30
02/20/2020	LN	05066.00002 Lexis Charges for 02-20-20	14.64
02/20/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
02/20/2020	RE2	SCAN/COPY ( 26 @0.10 PER PG)	2.60
02/21/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	47.22
02/21/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	4.68
02/21/2020	RE2	SCAN/COPY ( 51 @0.10 PER PG)	5.10
02/21/2020	RE2	SCAN/COPY ( 9 @0.10 PER PG)	0.90
02/26/2020	AF	Air Fare [E110] Delta Airlines, Tkt. 00675047276444, from ABQ to LAX, JIS	157.40
02/26/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.15

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 22  
Invoice 125212  
February 29, 2020

---

02/26/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	41.73
02/26/2020	TE	Travel Expense [E110] Travel Agency Service Fee, JIS	50.00
02/28/2020	AF	Air Fare [E110] Delta Airlines, Tkt. 00675057838335, from LAX to ABQ, ABQ to LAX, JIS	484.79
02/28/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	63.41
02/28/2020	TE	Travel Expense [E110] Travel Agency Service Fee, JIS	50.00
02/29/2020	RS	Research [E106] Everlaw, Inv. 24644	500.00
<b>Total Expenses for this Matter</b>			<b>\$5,024.17</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 02/29/2020**

**Total Fees \$229,550.00**

**Total Expenses 5,024.17**

**Total Due on Current Invoice \$234,574.17**

**Outstanding Balance from prior invoices as of 02/29/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$38,840.82
123345	09/30/2019	\$23,355.00	\$10.10	\$23,365.10
124730	10/31/2019	\$44,688.50	\$685.56	\$45,374.06
124933	11/30/2019	\$108,675.00	\$9,556.08	\$118,231.08
124949	12/31/2019	\$37,632.50	\$1,240.04	\$38,872.54
124969	01/31/2020	\$198,857.50	\$4,949.13	\$203,806.63

**Total Amount Due on Current and Prior Invoices: \$788,241.89**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

March 31, 2020

Invoice 125465

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 03/31/2020**

FEES	\$49,632.50
EXPENSES	\$2,118.58
<b>TOTAL CURRENT CHARGES</b>	<b>\$51,751.08</b>
<b>BALANCE FORWARD</b>	<b>\$788,241.89</b>
<b>TOTAL BALANCE DUE</b>	<b>\$839,992.97</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
CHM	Mackle, Cia H.	Counsel	675.00	0.20	\$135.00
GNB	Brown, Gillian N.	Counsel	675.00	1.20	\$810.00
GSG	Greenwood, Gail S.	Counsel	675.00	24.30	\$16,402.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	5.30	\$3,577.50
IDS	Scharf, Ilan D.	Partner	675.00	8.80	\$5,940.00
JIS	Stang, James I.	Partner	337.50	9.00	\$3,037.50
JIS	Stang, James I.	Partner	675.00	21.00	\$14,175.00
KHB	Brown, Kenneth H.	Partner	675.00	1.70	\$1,147.50
PJJ	Jeffries, Patricia J.	Paralegal	425.00	1.00	\$425.00
VAN	Newmark, Victoria A.	Counsel	675.00	5.90	\$3,982.50
				<hr/> 78.40	<hr/> \$49,632.50



---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	1.30	\$627.50
AD	Asset Disposition [B130]	4.10	\$2,767.50
DO	Document Production	0.20	\$135.00
GC	General Creditors Comm. [B150]	10.80	\$7,290.00
IC	Insurance Coverage	4.40	\$2,970.00
OCA	Outgoing Claims Analysis	26.50	\$17,887.50
PD	Plan & Disclosure Stmt. [B320]	11.60	\$7,830.00
RP	Retention of Prof. [B160]	7.40	\$4,995.00
RPO	Ret. of Prof./Other	2.70	\$1,822.50
SL	Stay Litigation [B140]	0.40	\$270.00
TR	Travel	9.00	\$3,037.50
		78.40	<hr/> \$49,632.50

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Air Fare [E110]	\$321.82
Auto Travel Expense [E109]	\$100.22
Conference Call [E105]	\$348.78
CourtLink	\$17.38
Hotel Expense [E110]	\$699.73
Lexis/Nexis- Legal Research [E	\$38.75
Pacer - Court Research	\$13.10
Reproduction/ Scan Copy	\$28.80
Research [E106]	\$500.00
Travel Expense [E110]	\$50.00
	<hr/>
	\$2,118.58

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
03/10/2020	PJJ	AA	Revise real property analysis.	1.00	425.00	\$425.00
03/26/2020	KHB	AA	Review email to debtor's counsel re ownership of parish property.	0.10	675.00	\$67.50
03/27/2020	JIS	AA	Telephone call with FE regarding DLF balances and water rights.	0.20	675.00	\$135.00
				<b>1.30</b>		<b>\$627.50</b>
<b>Asset Disposition [B130]</b>						
03/10/2020	JIS	AD	Revised proposed letter regarding sale of real property.	0.40	675.00	\$270.00
03/19/2020	IDS	AD	Attend call with Debtor's counsel regarding asset sales.	1.00	675.00	\$675.00
03/19/2020	IDS	AD	Email to JIS regarding asset sales.	0.30	675.00	\$202.50
03/19/2020	IDS	AD	Prepare for call with Debtor's counsel regarding disposition of property.	0.20	675.00	\$135.00
03/20/2020	JIS	AD	Telephone call with Ed Mazel regarding available property and follow up with property description.	0.20	675.00	\$135.00
03/25/2020	JIS	AD	Review March 19 correspondence regarding properties and email to Debtor counsel re status of actions.	0.50	675.00	\$337.50
03/26/2020	IDS	AD	Call with Debtor's counsel, SCC, Committee chair regarding real estate disposition.	1.50	675.00	\$1,012.50
				<b>4.10</b>		<b>\$2,767.50</b>
<b>Document Production</b>						
03/01/2020	CHM	DO	Review dropbox contents and reconcile with review platform database; email J. Stang and G. Greenwood re same.	0.20	675.00	\$135.00
				<b>0.20</b>		<b>\$135.00</b>
<b>General Creditors Comm. [B150]</b>						
03/02/2020	IDS	GC	Telephone call with James Stang re case status..	0.30	675.00	\$202.50
03/05/2020	JIS	GC	Draft status conference statement.	1.00	675.00	\$675.00
03/06/2020	JIS	GC	Review/revise status conference statement.	0.50	675.00	\$337.50
03/09/2020	JIS	GC	Attend meeting with State Court Counsel and C. Paez regarding status conference and attend status conference.	2.50	675.00	\$1,687.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/09/2020	IDS	GC	Telephone conference with Jim Stang regarding status conference.	0.30	675.00	\$202.50
03/11/2020	JIS	GC	Committee meeting.	1.00	675.00	\$675.00
03/13/2020	JIS	GC	Telephone call with survivor regarding case status.	0.10	675.00	\$67.50
03/16/2020	IAWN	GC	Attend conference call with committee	0.80	675.00	\$540.00
03/16/2020	JIS	GC	Conference call with State Court Counsel regarding mediation and real property program.	0.70	675.00	\$472.50
03/18/2020	JIS	GC	Committee call regarding property program and mediator.	0.90	675.00	\$607.50
03/20/2020	JIS	GC	State Court Counsel call regarding case status.	0.20	675.00	\$135.00
03/25/2020	JIS	GC	Telephone call with State Court Counsel regarding mediation concepts and preparation of Committee meeting agenda.	0.40	675.00	\$270.00
03/25/2020	JIS	GC	Committee call regarding mediation and property disposition.	0.50	675.00	\$337.50
03/26/2020	JIS	GC	Conference call with Debtor's counsel regarding mediation and real property plans.	1.50	675.00	\$1,012.50
03/26/2020	JIS	GC	Telephone call with survivor regarding case status.	0.10	675.00	\$67.50
				<b>10.80</b>		<b>\$7,290.00</b>

### Insurance Coverage

03/04/2020	IAWN	IC	Review Halll commentary on settlement strategy and mediation	0.50	675.00	\$337.50
03/05/2020	IAWN	IC	Review status conference report, exchange emails with James I Stang re same	0.30	675.00	\$202.50
03/05/2020	IAWN	IC	Review status conference report, exchange emails with James I Stang re same	0.30	675.00	\$202.50
03/06/2020	IAWN	IC	Review status conference draft, and insurance section and supply comments to James I. Stang re same	0.30	675.00	\$202.50
03/06/2020	IAWN	IC	Review draft pleading from ASDF counsel and analyze	0.90	675.00	\$607.50
03/08/2020	IAWN	IC	Review Papas mediation communication	0.10	675.00	\$67.50
03/08/2020	IAWN	IC	Exchange emails and telephone calls with James I. Stang re draft pleading from ASDF	0.40	675.00	\$270.00
03/08/2020	IAWN	IC	Exchange emails with Murray re telephone call re insurance	0.10	675.00	\$67.50
03/09/2020	IAWN	IC	Review ASDF letter re mediation	0.10	675.00	\$67.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/11/2020	IAWN	IC	Exchange emails with Ilan Scharf re draft pleading from ASDF	0.10	675.00	\$67.50
03/13/2020	IAWN	IC	Review ASDF and Papas correspondence re mediation	0.10	675.00	\$67.50
03/13/2020	IAWN	IC	Exchange emails with Murraray re telephone call	0.10	675.00	\$67.50
03/15/2020	IAWN	IC	Prepare for call with Murray	0.40	675.00	\$270.00
03/15/2020	IAWN	IC	Telephone conference with Murray re insurance issues	0.50	675.00	\$337.50
03/15/2020	IAWN	IC	Prepare email discussing Murray call for James I Stang	0.20	675.00	\$135.00
				<b>4.40</b>		<b>\$2,970.00</b>

### Outgoing Claims Analysis

03/02/2020	GSG	OCA	Email team re 2/19 ADSF production.	0.30	675.00	\$202.50
03/05/2020	GSG	OCA	Review letter from ASF re response re derivative standing.	0.20	675.00	\$135.00
03/06/2020	IAWN	OCA	Review Ken Brown standing rejection email from ASDF	0.10	675.00	\$67.50
03/06/2020	KHB	OCA	Review and revise status conference statement and email to J. Stang re same.	0.30	675.00	\$202.50
03/06/2020	KHB	OCA	Review Debtor's response to standing demand letter.	0.30	675.00	\$202.50
03/06/2020	KHB	OCA	Emails to J. Stang, S. Golden and G. Greenwood re same.	0.20	675.00	\$135.00
03/06/2020	GSG	OCA	Research / review cases cited re standing; follow-up re Fox decision.	0.80	675.00	\$540.00
03/09/2020	KHB	OCA	Emails with G. Greenwood re standing motion.	0.10	675.00	\$67.50
03/09/2020	KHB	OCA	Confer with G. Greenwood re avoidance complaints.	0.10	675.00	\$67.50
03/09/2020	GSG	OCA	Review cases / revise motion re 10th Circuit standard for derivative standing and dominant case law.	4.00	675.00	\$2,700.00
03/09/2020	GSG	OCA	Review status of adversary complaints, exhibits, and causes of action.	0.60	675.00	\$405.00
03/09/2020	GSG	OCA	Revise motion re demand and timelines arguments.	2.70	675.00	\$1,822.50
03/09/2020	GSG	OCA	Review Exh. 8 / spreadsheet re unrecorded parish interests; notes re same.	0.30	675.00	\$202.50
03/10/2020	KHB	OCA	Work on avoidance complaint.	0.40	675.00	\$270.00
03/10/2020	GSG	OCA	Review / correct spreadsheets re parishes and selection of representative parishes as dependents;	2.70	675.00	\$1,822.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			revise complaints re same.			
03/10/2020	GSG	OCA	Research BAP as precedential in 10th circuit.	0.40	675.00	\$270.00
03/10/2020	GSG	OCA	Draft / revise motion for standing re self-settled trust arguments and citations to complaints.	3.10	675.00	\$2,092.50
03/11/2020	GSG	OCA	Draft / revise motion for standing re factual background and conclusion.	3.30	675.00	\$2,227.50
03/11/2020	GSG	OCA	Revise complaints re final edits.	0.40	675.00	\$270.00
03/11/2020	GSG	OCA	Review and add UFTA cases to standing motion.	0.40	675.00	\$270.00
03/13/2020	KHB	OCA	Confer with G. Greenwood re motion for standing.	0.10	675.00	\$67.50
03/17/2020	GSG	OCA	Revise/edit standing motion and RE Trust complaint.	1.90	675.00	\$1,282.50
03/27/2020	JIS	OCA	Conference call with State Court Counsel regarding mediation and real property issues.	0.60	675.00	\$405.00
03/30/2020	GSG	OCA	Revise / edit standing motion re self-settled trust claims; email re status and outstanding factual info.	3.20	675.00	\$2,160.00
				<b>26.50</b>		<b>\$17,887.50</b>

**Plan & Disclosure Stmt. [B320]**

03/02/2020	JIS	PD	Telephone call with Leo Papas regarding mediation call with Debtor.	0.40	675.00	\$270.00
03/02/2020	JIS	PD	Telephone call with mediator and Debtor regarding mediation.	0.80	675.00	\$540.00
03/06/2020	JIS	PD	State Court Counsel call regarding mediation issues.	1.00	675.00	\$675.00
03/10/2020	JIS	PD	Telephone call with Leo Papas regarding mediation status.	0.20	675.00	\$135.00
03/10/2020	JIS	PD	Conference call with FE and Leo Papas regarding mediation issues.	0.50	675.00	\$337.50
03/10/2020	JIS	PD	Conference call with State Court Counsel regarding mediation and counter/offers.	1.80	675.00	\$1,215.00
03/10/2020	JIS	PD	Meeting with BH and LM (State Court Counsel) re mediation issues.	1.00	675.00	\$675.00
03/13/2020	JIS	PD	Conference call with state court counsel regarding mediation status and real estate issues.	0.70	675.00	\$472.50
03/13/2020	KHB	PD	Emails from committee members re mediation.	0.10	675.00	\$67.50
03/16/2020	JIS	PD	Telephone call with Debtor counsel regarding property dispositions and mediator.	0.80	675.00	\$540.00
03/16/2020	IDS	PD	Call with Debtor regarding insurance, mediation.	1.00	675.00	\$675.00
03/19/2020	JIS	PD	Review and revise archive agreement.	0.30	675.00	\$202.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/22/2020	IDS	PD	Call with mediator candidate Mallot.	1.10	675.00	\$742.50
03/23/2020	JIS	PD	Telephone call with potential mediator.	0.60	675.00	\$405.00
03/27/2020	JIS	PD	Telephone call with mediator re status.	0.20	675.00	\$135.00
03/30/2020	JIS	PD	telephone call Brad Hall regarding Mallot letter	0.10	675.00	\$67.50
03/30/2020	JIS	PD	review proposed mediation stipulation and email comments re same	0.20	675.00	\$135.00
03/30/2020	IDS	PD	Review and revise stipulated mediation order.	0.80	675.00	\$540.00
				<b>11.60</b>		<b>\$7,830.00</b>

#### **Retention of Prof. [B160]**

03/10/2020	VAN	RP	Draft applications to employ real estate appraisers.	1.40	675.00	\$945.00
03/11/2020	VAN	RP	Analysis regarding appraiser employment applications; draft same.	2.80	675.00	\$1,890.00
03/17/2020	VAN	RP	Draft appraiser retention applications.	1.40	675.00	\$945.00
03/18/2020	VAN	RP	Email correspondence with James Stang regarding appraiser retention.	0.30	675.00	\$202.50
03/23/2020	GNB	RP	Draft supplemental declaration of J. Stang in support of PSZJ employment.	1.20	675.00	\$810.00
03/23/2020	JIS	RP	Email to Gillian Brown re supplementary declaration re BSA and revise declaration.	0.30	675.00	\$202.50
				<b>7.40</b>		<b>\$4,995.00</b>

#### **Ret. of Prof./Other**

03/02/2020	IDS	RPO	Follow up with Bryan Cave regarding request for payment.	0.30	675.00	\$202.50
03/10/2020	JIS	RPO	Emails to Victoria Newmark regarding employment of appraiser Ron Alfred and Jeff Hanus.	0.40	675.00	\$270.00
03/26/2020	IDS	RPO	Review Bryan Care invoices.	0.60	675.00	\$405.00
03/26/2020	IDS	RPO	Email to Committee regarding payments of Bryan Care invoices.	0.40	675.00	\$270.00
03/27/2020	IDS	RPO	Email to Committee member (MB) regarding Bryan Care fees.	0.40	675.00	\$270.00
03/27/2020	IDS	RPO	Review rates /files to prepare response to committee member (MB) inquiry regarding Bryan Care fees.	0.40	675.00	\$270.00
03/31/2020	IDS	RPO	Email to B. Care attorneys regarding payment of fees.	0.20	675.00	\$135.00
				<b>2.70</b>		<b>\$1,822.50</b>

---

**Stay Litigation [B140]**

03/10/2020	JIS	SL	Draft email response regarding stay relief motion (Rothstein clients).	0.40	675.00	\$270.00
				<hr/>		<hr/>
				<b>0.40</b>		<b>\$270.00</b>

**Travel**

03/08/2020	JIS	TR	Travel from Los Angeles to Albuquerque for status conference hearing (billed at half rate)	5.00	337.50	\$1,687.50
03/13/2020	JIS	TR	Travel from Albuquerque regarding status conference hearing (billed at half rate)	4.00	337.50	\$1,350.00
				<hr/>		<hr/>
				<b>9.00</b>		<b>\$3,037.50</b>

<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$49,632.50</b>
--	--	--	--	--	--	--------------------



---

**Expenses**

03/02/2020	AF	Air Fare [E110] Southwest Airlines, Tkt. 5262177779142, From ABQ to MDW to BUF, JIS	321.82
03/04/2020	TE	Travel Expense [E110] Travel Agency Service Fee, JIS	50.00
03/05/2020	AT	Auto Travel Expense [E109] Uber Transportation Service, JIS	15.45
03/05/2020	CL	05066.00002 CourtLink charges for 03-05-20	17.38
03/06/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	72.77
03/06/2020	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
03/06/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
03/06/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
03/06/2020	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
03/06/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
03/08/2020	HT	Hotel Expense [E110] Marriott Albuquerque, 3 nights, JIS	699.73
03/09/2020	AT	Auto Travel Expense [E109] Uber Transportation Service, JIS	19.53
03/09/2020	AT	Auto Travel Expense [E109]Uber Transportation Service, JIS	13.50
03/09/2020	AT	Auto Travel Expense [E109]Uber Transportation Service, JIS	14.90
03/09/2020	LN	05066.00002 Lexis Charges for 03-09-20	13.51

---

03/09/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
03/09/2020	RE2	SCAN/COPY ( 23 @0.10 PER PG)	2.30
03/09/2020	RE2	SCAN/COPY ( 24 @0.10 PER PG)	2.40
03/09/2020	RE2	SCAN/COPY ( 25 @0.10 PER PG)	2.50
03/09/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
03/09/2020	RE2	SCAN/COPY ( 4 @0.10 PER PG)	0.40
03/09/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
03/09/2020	RE2	SCAN/COPY ( 4 @0.10 PER PG)	0.40
03/09/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
03/09/2020	RE2	SCAN/COPY ( 23 @0.10 PER PG)	2.30
03/09/2020	RE2	SCAN/COPY ( 9 @0.10 PER PG)	0.90
03/09/2020	RE2	SCAN/COPY ( 25 @0.10 PER PG)	2.50
03/09/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
03/09/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
03/09/2020	RE2	SCAN/COPY ( 9 @0.10 PER PG)	0.90
03/09/2020	RE2	SCAN/COPY ( 24 @0.10 PER PG)	2.40
03/10/2020	LN	05066.00002 Lexis Charges for 03-10-20	8.41
03/11/2020	AT	Auto Travel Expense [E109] Uber Transportation Service, JIS	14.30

---

03/11/2020	AT	Auto Travel Expense [E109]Uber Transportation Service, JIS	22.54
03/11/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	45.64
03/11/2020	LN	05066.00002 Lexis Charges for 03-11-20	16.83
03/13/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	57.77
03/18/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	42.10
03/19/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	49.41
03/20/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	18.02
03/23/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	28.75
03/25/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	33.73
03/29/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.59
03/31/2020	PAC	Pacer - Court Research	13.10
03/31/2020	RS	Research [E106] Everlaw, Inv. 25548	500.00
<b>Total Expenses for this Matter</b>			<b>\$2,118.58</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 03/31/2020**

**Total Fees \$49,632.50**

**Total Expenses 2,118.58**

**Total Due on Current Invoice \$51,751.08**

**Outstanding Balance from prior invoices as of 03/31/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$38,840.82
123345	09/30/2019	\$23,355.00	\$10.10	\$23,365.10
124730	10/31/2019	\$44,688.50	\$685.56	\$45,374.06
124933	11/30/2019	\$108,675.00	\$9,556.08	\$118,231.08
124949	12/31/2019	\$37,632.50	\$1,240.04	\$38,872.54
124969	01/31/2020	\$198,857.50	\$4,949.13	\$203,806.63
125212	02/29/2020	\$229,550.00	\$5,024.17	\$234,574.17

**Total Amount Due on Current and Prior Invoices: \$839,992.97**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

April 30, 2020

Invoice 125486

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2020**

FEES \$27,742.50

EXPENSES \$908.67

**TOTAL CURRENT CHARGES** **\$28,651.17**

**BALANCE FORWARD** **\$839,992.97**

**TOTAL BALANCE DUE** **\$868,644.14**

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	0.30	\$202.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	15.90	\$10,732.50
IDS	Scharf, Ilan D.	Partner	675.00	10.10	\$6,817.50
JIS	Stang, James I.	Partner	675.00	12.00	\$8,100.00
KHB	Brown, Kenneth H.	Partner	675.00	2.80	\$1,890.00
				<hr/> 41.10	<hr/> \$27,742.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition [B130]	5.30	\$3,577.50
FN	Financing [B230]	2.20	\$1,485.00
GC	General Creditors Comm. [B150]	1.00	\$675.00
H	Hearings	0.60	\$405.00
IC	Insurance Coverage	12.70	\$8,572.50
OCA	Outgoing Claims Analysis	3.10	\$2,092.50
PD	Plan & Disclosure Stmt. [B320]	15.90	\$10,732.50
RPO	Ret. of Prof./Other	0.20	\$135.00
SL	Stay Litigation [B140]	0.10	\$67.50
		41.10	<hr/> \$27,742.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 125486  
April 30, 2020

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Auto Travel Expense [E109]	\$180.45
Conference Call [E105]	\$112.89
Lexis/Nexis- Legal Research [E	\$31.48
Legal Vision Atty Mess Service	\$52.55
Pacer - Court Research	\$10.60
Reproduction/ Scan Copy	\$20.70
Research [E106]	\$500.00
	<hr/>
	\$908.67



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Disposition [B130]</b>						
04/01/2020	IDS	AD	Telephone call with James Stang regarding property sales.	0.20	675.00	\$135.00
04/06/2020	JIS	AD	Call with broker regarding sale of Debtor properties.	0.10	675.00	\$67.50
04/06/2020	JIS	AD	Review three listing agreements and forward comments to Debtor's counsel.	0.70	675.00	\$472.50
04/06/2020	IDS	AD	Prepare for call with Ford, SCC regarding real estate sales.	0.20	675.00	\$135.00
04/06/2020	IDS	AD	Telephone conference with debtor's counsel, SCC regarding real estate sales.	0.80	675.00	\$540.00
04/06/2020	IDS	AD	Telephone conference with Jim Stang regarding release sales.	0.20	675.00	\$135.00
04/08/2020	JIS	AD	Call with F. Elsaesser regarding real property listings.	0.10	675.00	\$67.50
04/16/2020	IDS	AD	Draft memo to Committee regarding asset sales.	0.70	675.00	\$472.50
04/17/2020	JIS	AD	Call with Debtor re real property status.	0.20	675.00	\$135.00
04/17/2020	IDS	AD	Telephone call with Debtor's counsel regarding real estate sales.	1.00	675.00	\$675.00
04/17/2020	IDS	AD	Emails with T. Walker regarding property sales.	0.20	675.00	\$135.00
04/20/2020	IDS	AD	Review memo to Committee regarding asset sales.	0.60	675.00	\$405.00
04/20/2020	IDS	AD	Email to T. Walker regarding Cathedral Parish properties.	0.30	675.00	\$202.50
				<b>5.30</b>		<b>\$3,577.50</b>
<b>Financing [B230]</b>						
04/28/2020	IDS	FN	Emails with L. Ford, B. Hall regarding PPP loan	0.40	675.00	\$270.00
04/28/2020	IDS	FN	Review pleadings regarding PPP loan	1.80	675.00	\$1,215.00
				<b>2.20</b>		<b>\$1,485.00</b>
<b>General Creditors Comm. [B150]</b>						
04/01/2020	JIS	GC	Email to Committee re status of insurance, real estate, mediation.	0.30	675.00	\$202.50
04/02/2020	JIS	GC	Call with Brad Hall regarding insurance issues, MOU and Committee discussions.	0.20	675.00	\$135.00
04/10/2020	JIS	GC	Status call with all state court counsel: real property and insurance.	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/14/2020	JIS	GC	Call with Brad Hall regarding real estate issues and mediation.	0.30	675.00	\$202.50
				<u>1.00</u>		<u>\$675.00</u>

### Hearings

04/06/2020	JIS	H	Court call re status.	0.60	675.00	\$405.00
				<u>0.60</u>		<u>\$405.00</u>

### Insurance Coverage

04/01/2020	IAWN	IC	Review emails between Murray and James I. Stang re call	0.10	675.00	\$67.50
04/01/2020	IAWN	IC	Review stand summary of status to SCC	0.10	675.00	\$67.50
04/01/2020	IAWN	IC	Review and analyze Monagle emails re arbitration (.2), draft and send email re Murray, prior call with Murray and arbitration to James I. Stang (.2), prepare for call tomorrow with debtor re insurance issues (1.0)	1.40	675.00	\$945.00
04/01/2020	JIS	IC	Emails regarding insurance conference call.	0.20	675.00	\$135.00
04/02/2020	IAWN	IC	Telephone conference with debtor re insurance issues	1.00	675.00	\$675.00
04/02/2020	IDS	IC	Telephone call with Debtor's counsel regarding insurance issues and mediation.	0.80	675.00	\$540.00
04/07/2020	IAWN	IC	Exchange emails with James I. Stang re Murray call	0.10	675.00	\$67.50
04/08/2020	IAWN	IC	Exchange emails with James I. Stang re water rights, review file and pull email re same from Monagle	0.10	675.00	\$67.50
04/19/2020	IAWN	IC	Analyze hall emails and charts,review coverage chart against perp chart and claims chart, assess limits of loss on insurer by insurer basis, develop strategy re same	4.30	675.00	\$2,902.50
04/20/2020	IAWN	IC	Telephone conference with James I Stang re Archdiocese of Santa Fe situation, Mallot, plan structure, settlements	0.60	675.00	\$405.00
04/20/2020	IAWN	IC	Exchange emails with Murray re insurers	0.10	675.00	\$67.50
04/20/2020	IAWN	IC	Telephone conference with debtor counsel re mediation	0.80	675.00	\$540.00
04/20/2020	IAWN	IC	Review and assess ford submission to Malott in preparation for call	0.20	675.00	\$135.00
04/24/2020	IAWN	IC	Telephone conference with SCC re plan going forward	1.40	675.00	\$945.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/24/2020	IAWN	IC	Review file and forward article re consolidation of arbitrations to Monagle and Ford	0.10	675.00	\$67.50
04/24/2020	IAWN	IC	Draft email for SCC analyzing and suggesting methodology for identifying major insurer exposure, charts attached	0.90	675.00	\$607.50
04/24/2020	IAWN	IC	Exchange emails with James I Stang and Ilan Scharf re draft email to SCC	0.10	675.00	\$67.50
04/24/2020	IAWN	IC	Finalize and send email to SCC re insurer exposure issues	0.10	675.00	\$67.50
04/29/2020	IAWN	IC	Exchange emails with Monagle re settlement clauses, review same and analyze	0.30	675.00	\$202.50
				<b>12.70</b>		<b>\$8,572.50</b>

#### Outgoing Claims Analysis

01/22/2020	KHB	OCA	Work on memo re claims to bring property into estate.	2.80	675.00	\$1,890.00
04/24/2020	GSG	OCA	Review recent case re standing under 544 and triggering creditor.	0.30	675.00	\$202.50
				<b>3.10</b>		<b>\$2,092.50</b>

#### Plan & Disclosure Stmt. [B320]

04/02/2020	JIS	PD	Call with Debtor regarding insurance issues for mediation.	0.80	675.00	\$540.00
04/07/2020	IDS	PD	Review mediator stipulated order.	0.20	675.00	\$135.00
04/20/2020	JIS	PD	Conference call with mediator regarding status.	0.70	675.00	\$472.50
04/20/2020	JIS	PD	Review/sign/deliver MOU on documents and email to Committee re same.	0.20	675.00	\$135.00
04/20/2020	IDS	PD	Call with A. Malott regarding mediation and insurance.	0.80	675.00	\$540.00
04/21/2020	IAWN	PD	Prepare for call with mediator and SCC and debtor	0.50	675.00	\$337.50
04/21/2020	IAWN	PD	Telephone conference with Malott with SCC and debtor	1.90	675.00	\$1,282.50
04/21/2020	JIS	PD	Call with mediator regarding case background.	1.50	675.00	\$1,012.50
04/22/2020	JIS	PD	Committee call regarding mediation status.	1.50	675.00	\$1,012.50
04/24/2020	JIS	PD	Call with state court counsel regarding mediation.	1.00	675.00	\$675.00
04/24/2020	IDS	PD	Attend counsel call regarding mediation	1.00	675.00	\$675.00
04/26/2020	IAWN	PD	Telephone conference, review arbitration clause with James I Stang to discuss plan options.	0.60	675.00	\$405.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/26/2020	IAWN	PD	Review settlement agreement, coverage chart re plan options	0.80	675.00	\$540.00
04/26/2020	JIS	PD	Review Hall memo regarding mediation strategy(.5); call with Iain Nasatir re same (.6); call with Robert Feinstein regarding gifting issues (.3).	1.40	675.00	\$945.00
04/27/2020	IAWN	PD	Review and analyze James I Stang plan structure email	0.40	675.00	\$270.00
04/28/2020	JIS	PD	Call with Iain Nasatir re plan idea for insurance issues.	0.20	675.00	\$135.00
04/28/2020	IDS	PD	Telephone conference with counsel to Franciscans regarding mediation	0.20	675.00	\$135.00
04/28/2020	IDS	PD	Email to B. Hall regarding liquidation analysis	0.70	675.00	\$472.50
04/29/2020	JIS	PD	Call with Brad Hall and Levi Monagle regarding plan concepts.	0.80	675.00	\$540.00
04/29/2020	JIS	PD	Review excerpt re settlement in insurance agreements and research enforcement of arbitration.	0.40	675.00	\$270.00
04/29/2020	JIS	PD	Call with Iain Nasatir regarding arbitration clauses in insurance settlement agreements.	0.30	675.00	\$202.50
				<b>15.90</b>		<b>\$10,732.50</b>
<b>Ret. of Prof./Other</b>						
04/20/2020	JIS	RPO	Review three employment applications for brokers.	0.20	675.00	\$135.00
				<b>0.20</b>		<b>\$135.00</b>
<b>Stay Litigation [B140]</b>						
04/20/2020	JIS	SL	Review OSC re contempt and response.	0.10	675.00	\$67.50
				<b>0.10</b>		<b>\$67.50</b>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$27,742.50</b>

---

**Expenses**

06/17/2019	LV	Legal Vision Atty/Mess. Service- Inv. 06103, Clementine, IAWN	52.55
08/01/2019	LN	05066.00001 Lexis Charges for 08-01-19	31.48
11/08/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.70
11/08/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.65
11/17/2019	AT	Auto Travel Expense [E109] Elite Transportation Service, Inv.1799428, From New Rochelle NY to JFK, IDS	153.14
01/13/2020	RE2	SCAN/COPY ( 207 @0.10 PER PG)	20.70
03/09/2020	AT	Auto Travel Expense [E109] Uber Transportation Service, JIS	27.31
04/03/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.71
04/08/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	1.80
04/10/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	14.77
04/14/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.91
04/17/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.08
04/22/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	93.27
04/30/2020	PAC	Pacer - Court Research	10.60
04/30/2020	RS	Research [E106] Everlaw, Inv. 26492	500.00
<b>Total Expenses for this Matter</b>			<b>\$908.67</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 04/30/2020**

**Total Fees \$27,742.50**

**Total Expenses 908.67**

**Total Due on Current Invoice \$28,651.17**

**Outstanding Balance from prior invoices as of 04/30/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$38,840.82
123345	09/30/2019	\$23,355.00	\$10.10	\$23,365.10
124730	10/31/2019	\$44,688.50	\$685.56	\$45,374.06
124933	11/30/2019	\$108,675.00	\$9,556.08	\$118,231.08
124949	12/31/2019	\$37,632.50	\$1,240.04	\$38,872.54
124969	01/31/2020	\$198,857.50	\$4,949.13	\$203,806.63
125212	02/29/2020	\$229,550.00	\$5,024.17	\$234,574.17
125465	03/31/2020	\$49,632.50	\$2,118.58	\$51,751.08

**Total Amount Due on Current and Prior Invoices: \$868,644.14**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

May 31, 2020

Invoice 125487

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2020**

FEES	\$85,545.00
EXPENSES	\$500.00
<b>TOTAL CURRENT CHARGES</b>	<b>\$86,045.00</b>
<b>BALANCE FORWARD</b>	<b>\$868,644.14</b>
<b>TOTAL BALANCE DUE</b>	<b>\$954,689.14</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	48.90	\$33,007.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	20.10	\$13,567.50
IDS	Scharf, Ilan D.	Partner	675.00	11.30	\$7,627.50
JIS	Stang, James I.	Partner	675.00	19.90	\$13,432.50
KHB	Brown, Kenneth H.	Partner	675.00	26.20	\$17,685.00
LAF	Forrester, Leslie A.	Other	450.00	0.50	\$225.00
				<hr/> 126.90	<hr/> \$85,545.00



---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	2.70	\$1,822.50
AD	Asset Disposition [B130]	6.10	\$4,117.50
FN	Financing [B230]	0.40	\$270.00
GC	General Creditors Comm. [B150]	10.40	\$6,907.50
IC	Insurance Coverage	20.10	\$13,567.50
OCA	Outgoing Claims Analysis	75.70	\$51,097.50
PD	Plan & Disclosure Stmt. [B320]	11.40	\$7,695.00
SL	Stay Litigation [B140]	0.10	\$67.50
		126.90	<hr/> \$85,545.00

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 125487  
May 31, 2020

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Research [E106]	\$500.00
	<hr/>
	\$500.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
05/04/2020	JIS	AA	Revise memo on subsidiary assets for New Mexico law.	2.30	675.00	\$1,552.50
05/11/2020	KHB	AA	Review memo to committee re accessing parish assets.	0.40	675.00	\$270.00
				<b>2.70</b>		<b>\$1,822.50</b>
<b>Asset Disposition [B130]</b>						
05/11/2020	JIS	AD	Call with Debtor's counsel regarding real property.	1.50	675.00	\$1,012.50
05/11/2020	IDS	AD	Telephone call with James Stang regarding asset sales.	0.20	675.00	\$135.00
05/15/2020	IDS	AD	Telephone call with SCC regarding asset sales.	1.00	675.00	\$675.00
05/19/2020	JIS	AD	Conference call with Debtor counsel regarding real property disposition (partial).	0.40	675.00	\$270.00
05/19/2020	IDS	AD	Telephone call with Archdiocese of Santa Fe counsel, SCC regarding property sales.	1.00	675.00	\$675.00
05/19/2020	IDS	AD	Telephone call with James Stang regarding property sales.	0.20	675.00	\$135.00
05/20/2020	IDS	AD	Review correspondence by SCC regarding real estate value.	0.20	675.00	\$135.00
05/26/2020	JIS	AD	Telephone call with B. Hall and L. Ford re scope of debtor's property.	0.30	675.00	\$202.50
05/26/2020	JIS	AD	Review Immaculate Heart Retreat Center offer.	0.10	675.00	\$67.50
05/26/2020	IDS	AD	Review email from P. Linnenberger regarding asset sales.	0.20	675.00	\$135.00
05/26/2020	IDS	AD	Email to Jim Stang regarding asset sales.	0.20	675.00	\$135.00
05/27/2020	IDS	AD	Draft email to Jim Stang regarding asset sales.	0.40	675.00	\$270.00
05/27/2020	IDS	AD	Review email from L. Managle regarding asset sales.	0.40	675.00	\$270.00
				<b>6.10</b>		<b>\$4,117.50</b>
<b>Financing [B230]</b>						
05/01/2020	JIS	FN	Review Court's opinion regarding PPP application and review docket for copy of PPP application; email to Debtor's counsel for copy.	0.40	675.00	\$270.00
				<b>0.40</b>		<b>\$270.00</b>

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>General Creditors Comm. [B150]</b>						
05/01/2020	IDS	GC	Telephone call with SCC regarding settlement, mediation, plan, litigation options.	1.60	675.00	\$1,080.00
05/11/2020	JIS	GC	Call with Committee regarding real property and mediation.	1.80	675.00	\$1,215.00
05/11/2020	JIS	GC	Call with state court counsel after property call with Debtor's counsel regarding next steps.	1.10	675.00	\$742.50
05/11/2020	IDS	GC	Attend committee call regarding mediation and asset sales.	1.80	675.00	\$1,215.00
05/13/2020	JIS	GC	Revise memo to Committee regarding case options.	0.40	675.00	\$270.00
05/19/2020	JIS	GC	Call Brad Hall regarding agenda for 5/20 committee meeting and mediation issues.	0.20	675.00	\$135.00
05/20/2020	JIS	GC	Call with Committee re real property status, mediation strategy.	1.00	675.00	\$675.00
05/20/2020	IDS	GC	Attend committee call regarding property sales, mediation.	1.10	675.00	\$742.50
05/20/2020	IDS	GC	Prepare for committee call.	0.30	675.00	\$202.50
05/22/2020	JIS	GC	Call with state court counsel re property, mediation, plan.	0.60	675.00	\$405.00
05/28/2020	LAF	GC	Locate NM state court complaints.	0.50	450.00	\$225.00
				<b>10.40</b>		<b>\$6,907.50</b>

### Insurance Coverage

05/08/2020	IAWN	IC	Review Blumel and Hall emails	0.10	675.00	\$67.50
05/08/2020	IAWN	IC	Telephone conference with James I Stang re plan options and strategy	0.30	675.00	\$202.50
05/08/2020	IAWN	IC	Review file and emails re insurance options and analyze	0.80	675.00	\$540.00
05/08/2020	IAWN	IC	Exchange emails with Monagle re questions re N.M. law	0.10	675.00	\$67.50
05/10/2020	IAWN	IC	Review hall email re plan options and analyze same against claims analysis and insurance coverage	2.70	675.00	\$1,822.50
05/11/2020	IAWN	IC	Review emails re zoom call between SCC	0.10	675.00	\$67.50
05/11/2020	IAWN	IC	Review Monagle and James I Stang emails re insurance options	0.10	675.00	\$67.50
05/12/2020	IAWN	IC	Exchange emails with Monagle re call	0.10	675.00	\$67.50
05/13/2020	IAWN	IC	Research N.M law on assignability of	0.80	675.00	\$540.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			rights/judgments			
05/13/2020	IAWN	IC	Review hall emails re options (2019 & 2020) and back up support, and prepare for call with Monagle	1.00	675.00	\$675.00
05/13/2020	IAWN	IC	Telephone conference with Monagle re insurance options	1.40	675.00	\$945.00
05/13/2020	IAWN	IC	Review Paraclete case and analyze	0.50	675.00	\$337.50
05/13/2020	IAWN	IC	Telephone conference with Ford re insurance options and Paraclete case	0.30	675.00	\$202.50
05/13/2020	IAWN	IC	Telephone conference with Mallot, Hall, Ford, James I Stang re mediation	1.10	675.00	\$742.50
05/14/2020	IAWN	IC	Exchange emails with Ford re questions raised in email	0.10	675.00	\$67.50
05/14/2020	IAWN	IC	Review and analyze Ford issues, review coverage chart and documentation, research CUP, review audit pages on CUP	2.20	675.00	\$1,485.00
05/15/2020	IAWN	IC	Telephone conference with Murray re pooling documents	0.10	675.00	\$67.50
05/15/2020	IAWN	IC	Telephone conference with Ford re insurance issues and CUP/CM	1.20	675.00	\$810.00
05/15/2020	IAWN	IC	Review Burgi email re insurance options	0.80	675.00	\$540.00
05/15/2020	IAWN	IC	Review ford attachment re CM, analyze and respond re reinsurance	0.80	675.00	\$540.00
05/21/2020	IAWN	IC	Telephone conference with James I Stang re plan options (.2); exchange emails with Hall, Ford and Monagle re plan options (.1); analyze, revise and draft additional plan options to existing memo, and circulate same (1.3)	1.60	675.00	\$1,080.00
05/22/2020	IAWN	IC	Telephone conference with Hall and Monagle re plan options and IaiN A.W. Nasatir revised memo email	1.00	675.00	\$675.00
05/22/2020	IAWN	IC	Review emails re telephone conferences with committee re Archdiocese of Santa Fe negotiations	0.10	675.00	\$67.50
05/22/2020	IAWN	IC	Review and analyze Hall email/memos re plan options	1.70	675.00	\$1,147.50
05/22/2020	IAWN	IC	Respond re insurance issue in stating options to Hall	0.20	675.00	\$135.00
05/28/2020	IAWN	IC	Telephone conference with James I Stang re timing of standing motion and offer	0.10	675.00	\$67.50
05/29/2020	IAWN	IC	Review settlement offer and Hall and James I Stang emails re same	0.10	675.00	\$67.50
05/29/2020	IAWN	IC	Revise parts of settlement offer re insurance etc.	0.70	675.00	\$472.50

				20.10		\$13,567.50
<b>Outgoing Claims Analysis</b>						
05/06/2020	KHB	OCA	Consider recent authority re third party releases.	0.30	675.00	\$202.50
05/14/2020	KHB	OCA	Telephone call with J. Stang re standing motion (.1); telephone call with G. Greenwood re standing motion (.1); emails to J. Stang re alter ego issues and analyze authorities re same (.6); confer with J. Stang re alter ego issues (.1).	0.90	675.00	\$607.50
05/15/2020	GSG	OCA	Review standing motion and RE complaint re 544(b) and timeliness arguments.	2.70	675.00	\$1,822.50
05/18/2020	GSG	OCA	Review case law re discovery rule and statute of repose; review state court complaints by triggering creditors.	2.30	675.00	\$1,552.50
05/18/2020	GSG	OCA	Review/revise standing motion and avoidance complaints.	2.70	675.00	\$1,822.50
05/19/2020	KHB	OCA	Work on motion for standing to bring fraudulent transfer claims (.2); review email from PI Linnaberger re real estate issue (.2).	0.40	675.00	\$270.00
05/19/2020	GSG	OCA	Review available documents re DLF Trust; draft email re additional requests to ASF.	1.10	675.00	\$742.50
05/20/2020	JIS	OCA	Call with Ilan Scharf re standing motions and further edits.	0.40	675.00	\$270.00
05/20/2020	JIS	OCA	Call with Ken Brown re status of standing motions and additional input needed.	0.10	675.00	\$67.50
05/20/2020	IDS	OCA	Telephone call with James Stang regarding motion for standing.	0.20	675.00	\$135.00
05/21/2020	KHB	OCA	Work on motion to obtain standing to bring fraudulent transfer claims on behalf of estate and complaints.	8.70	675.00	\$5,872.50
05/21/2020	IDS	OCA	Review standing pleadings.	0.70	675.00	\$472.50
05/21/2020	GSG	OCA	Review ASF financials re DLF income and identification of assets; notes re same.	2.10	675.00	\$1,417.50
05/21/2020	GSG	OCA	Emails re standing motion and evidence.	0.20	675.00	\$135.00
05/21/2020	GSG	OCA	Review/revise complaint re avoidance of unrecorded property interests under 544(a)(3).	0.60	675.00	\$405.00
05/21/2020	GSG	OCA	Review standing motion re additional factual evidence and supporting documents from database.	3.80	675.00	\$2,565.00
05/21/2020	GSG	OCA	Email insert re IRS reach back period and case law.	0.40	675.00	\$270.00
05/22/2020	JIS	OCA	Call with Ken Brown regarding naming defendants on three complaints under standing motion.	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/22/2020	KHB	OCA	Work on motion for standing (3.8), confer with J. Stang re same (.2), review and revise complaints (.3); confer with G. Greenwood re standing motion (.2).	4.50	675.00	\$3,037.50
05/22/2020	GSG	OCA	Review deeds produced by ASF and compare to schedules re transfers to RE Trust and DLF Trust.	0.70	675.00	\$472.50
05/22/2020	GSG	OCA	Begin draft of K. Brown Declaration in support of standing.	0.90	675.00	\$607.50
05/22/2020	GSG	OCA	Review comments and revise motion for derivative standing re additional details.	4.70	675.00	\$3,172.50
05/22/2020	GSG	OCA	Follow up research re IRS reach back period and Vaughan criticism.	0.80	675.00	\$540.00
05/25/2020	GSG	OCA	Draft/revise standing motion re additional facts and evidence and citations.	5.80	675.00	\$3,915.00
05/25/2020	GSG	OCA	Review database re special warranty deeds and exemplar re transfer to trust.	0.80	675.00	\$540.00
05/26/2020	JIS	OCA	Review motion for standing.	0.40	675.00	\$270.00
05/26/2020	KHB	OCA	Work on motion for committee standing to bring avoidance and related claims on behalf of estate (4.4); review protective order re necessity for filing under seal (.4).	4.80	675.00	\$3,240.00
05/26/2020	IDS	OCA	Attention to NDA.	0.40	675.00	\$270.00
05/26/2020	IDS	OCA	Email with KHR regarding NDA.	0.20	675.00	\$135.00
05/26/2020	IDS	OCA	Email to G. Greenwood regarding NDA.	0.40	675.00	\$270.00
05/26/2020	GSG	OCA	Draft/revise K. Brown declaration in support of standing; blackline and circulate motion.	5.10	675.00	\$3,442.50
05/26/2020	GSG	OCA	Draft/revise complaints re ASF and identification of defendants.	1.50	675.00	\$1,012.50
05/26/2020	GSG	OCA	Review confidentiality issues and documents produced by ASF re filing.	0.60	675.00	\$405.00
05/26/2020	GSG	OCA	Review court guidelines and key opinions re standing.	0.70	675.00	\$472.50
05/27/2020	JIS	OCA	Call with Ken Brown re open issues on standing motion and timing of filing.	0.30	675.00	\$202.50
05/27/2020	KHB	OCA	Work on standing motion (2.3); confer with G. Greenwood and J. Stang re same (.1); confer with J. Stang re same (.1), confer with G. Greenwood re same.	2.50	675.00	\$1,687.50
05/27/2020	GSG	OCA	Review database re DLF issues and audited financials; prepare exhibit to motion re DLF	1.60	675.00	\$1,080.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			transfers.			
05/27/2020	GSG	OCA	Review database re DLF issues and audited financials; prepare exhibit to motion re DLF transfers.	1.60	675.00	\$1,080.00
05/27/2020	GSG	OCA	Review LBR and confer with S. Lee re filing; draft Notice of Motion and objection deadline.	1.10	675.00	\$742.50
05/27/2020	GSG	OCA	Review/finalize exhibits to K. Bbrown Dec. and standing motion.	5.40	675.00	\$3,645.00
05/28/2020	GSG	OCA	Review/revise final motion and tables; circulate pdfs to J. Stang.	0.80	675.00	\$540.00
05/28/2020	GSG	OCA	Confer with L. Forester re outstanding exhibit to standing motion.	0.30	675.00	\$202.50
05/28/2020	GSG	OCA	Emails re filing/exhibits to standing motion.	0.10	675.00	\$67.50
05/29/2020	KHB	OCA	Work on standing motion.	1.40	675.00	\$945.00
05/29/2020	GSG	OCA	Confer re state court complaints; revise and finalize K. Brown Dec and circulate files for filing.	0.50	675.00	\$337.50
				<b>75.70</b>		<b>\$51,097.50</b>

**Plan & Disclosure Stmt. [B320]**

05/05/2020	JIS	PD	Call Brad Hall regarding plan discussions.	0.50	675.00	\$337.50
05/07/2020	KHB	PD	Analyze re non-consensual third party plan releases (1.6); confer with J. Stang re same (.2).	1.80	675.00	\$1,215.00
05/08/2020	KHB	PD	Confer with J. Stang re recent authority on non-debtor releases in 10th Cir.	0.20	675.00	\$135.00
05/11/2020	JIS	PD	Final review of memo regarding parish values and plan.	0.20	675.00	\$135.00
05/13/2020	JIS	PD	Conference call with mediator regarding case status.	1.50	675.00	\$1,012.50
05/15/2020	JIS	PD	Call with Iain Nasatir regarding insurance strategy.	0.30	675.00	\$202.50
05/20/2020	KHB	PD	Review emails from J. Stang and mediator re mediation issues.	0.20	675.00	\$135.00
05/21/2020	JIS	PD	Call with Iain Nasatir regarding insurance structure for mediation and reorganization plan.	0.60	675.00	\$405.00
05/21/2020	JIS	PD	Call with Brad Hall regarding plan issues, including counter offer issues.	0.80	675.00	\$540.00
05/22/2020	IDS	PD	Zoom meeting with SCC regarding mediation.	0.80	675.00	\$540.00
05/27/2020	JIS	PD	Response to emails regarding committee meeting, standing motion, counter offers.	0.30	675.00	\$202.50
05/27/2020	JIS	PD	Call with B. Hall and LMonagle regarding	0.40	675.00	\$270.00



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			mediation strategies.			
05/27/2020	JIS	PD	Call with Ilan Scharf regarding presentation of counter offer and litigation demand.	0.20	675.00	\$135.00
05/28/2020	JIS	PD	Emails to state court counsel regarding settlement offer.	0.10	675.00	\$67.50
05/28/2020	JIS	PD	Draft settlement offer for Committee consideration.	1.60	675.00	\$1,080.00
05/29/2020	JIS	PD	Call with Brad Hall regarding settlement offer and standing motion.	0.20	675.00	\$135.00
05/29/2020	JIS	PD	Finalize settlement offer (including phone call with Iain N. re insurance issues [.6]; Debtor's counsel [.3] and Ken Brown [.6].	1.50	675.00	\$1,012.50
05/29/2020	JIS	PD	Call with B. Hall regarding settlement offer and standing motion.	0.20	675.00	\$135.00
				<u>11.40</u>		<u>\$7,695.00</u>
<b>Stay Litigation [B140]</b>						
05/12/2020	KHB	SL	ADSF review email from SCC re parish assets and settlement issues.	0.10	675.00	\$67.50
				<u>0.10</u>		<u>\$67.50</u>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$85,545.00</b>

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 12  
Invoice 125487  
May 31, 2020

---

**Expenses**

05/31/2020 RS Research [E106] Everlaw, Inc. Inv. 27475

500.00

**Total Expenses for this Matter**

**\$500.00**

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 05/31/2020**

**Total Fees \$85,545.00**

**Total Expenses 500.00**

**Total Due on Current Invoice \$86,045.00**

**Outstanding Balance from prior invoices as of 05/31/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$38,840.82
123345	09/30/2019	\$23,355.00	\$10.10	\$23,365.10
124730	10/31/2019	\$44,688.50	\$685.56	\$45,374.06
124933	11/30/2019	\$108,675.00	\$9,556.08	\$118,231.08
124949	12/31/2019	\$37,632.50	\$1,240.04	\$38,872.54
124969	01/31/2020	\$198,857.50	\$4,949.13	\$203,806.63
125212	02/29/2020	\$229,550.00	\$5,024.17	\$234,574.17
125465	03/31/2020	\$49,632.50	\$2,118.58	\$51,751.08
125486	04/30/2020	\$27,742.50	\$908.67	\$28,651.17

**Total Amount Due on Current and Prior Invoices: \$954,689.14**

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 14  
Invoice 125487  
May 31, 2020

---

# **Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

June 30, 2020

Invoice 125549

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

## **STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 06/30/2020**

FEES	\$65,475.00
------	-------------

EXPENSES	\$500.00
----------	----------

<b>TOTAL CURRENT CHARGES</b>	<b>\$65,975.00</b>
------------------------------	--------------------

<b>BALANCE FORWARD</b>	<b>\$946,439.14</b>
------------------------	---------------------

<b>TOTAL BALANCE DUE</b>	<b>\$1,012,414.14</b>
--------------------------	-----------------------

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	5.10	\$3,442.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	12.20	\$8,235.00
IDS	Scharf, Ilan D.	Partner	675.00	38.30	\$25,852.50
JIS	Stang, James I.	Partner	675.00	32.10	\$21,667.50
KHB	Brown, Kenneth H.	Partner	675.00	9.30	\$6,277.50
				<hr/> 97.00	<hr/> \$65,475.00

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	22.40	\$15,120.00
AD	Asset Disposition [B130]	3.60	\$2,430.00
CA	Case Administration [B110]	0.10	\$67.50
CO	Claims Admin/Objections[B310]	0.10	\$67.50
GC	General Creditors Comm. [B150]	15.80	\$10,665.00
H	Hearings	3.60	\$2,430.00
IC	Insurance Coverage	10.60	\$7,155.00
ME	Mediation	2.20	\$1,485.00
OCA	Outgoing Claims Analysis	16.90	\$11,407.50
PD	Plan & Disclosure Stmt. [B320]	15.50	\$10,462.50
RP	Retention of Prof. [B160]	0.50	\$337.50
SL	Stay Litigation [B140]	5.70	\$3,847.50
		97.00	<hr/> \$65,475.00

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 125549  
June 30, 2020

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Research [E106]	\$500.00
	<hr/>
	\$500.00



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
06/14/2020	IDS	AA	Continue diocesan value analysis/real property analysis.	3.80	675.00	\$2,565.00
06/15/2020	IDS	AA	Continue working on property and value analysis.	4.50	675.00	\$3,037.50
06/15/2020	IDS	AA	Telephone call with James Stang regarding property and value analysis.	0.30	675.00	\$202.50
06/16/2020	IDS	AA	Update / revise asset and property analysis.	1.80	675.00	\$1,215.00
06/16/2020	IDS	AA	Email to SCC regarding asset / property analysis.	0.30	675.00	\$202.50
06/16/2020	IDS	AA	Respond to B. Hall email regarding valuation.	0.30	675.00	\$202.50
06/17/2020	IDS	AA	Telephone call with James Stang regarding asset sales and value.	0.30	675.00	\$202.50
06/17/2020	IDS	AA	Respond to P. Linnerberger email regarding valuations, real property values.	0.40	675.00	\$270.00
06/17/2020	IDS	AA	Revise asset analysis, value.	0.80	675.00	\$540.00
06/17/2020	IDS	AA	Review AD documents regarding assets, property disclosures.	2.80	675.00	\$1,890.00
06/18/2020	JIS	AA	Draft two emails to Survivors Counsel regarding review of the real estate inventory and values.	0.10	675.00	\$67.50
06/23/2020	JIS	AA	Review 2018 schedule of real property for comparison purposes.	0.30	675.00	\$202.50
06/23/2020	IDS	AA	Telephone conference with Jim Stang regarding discrepancies in property disclosures.	0.30	675.00	\$202.50
06/23/2020	IDS	AA	Review files, record regarding disclosure of properties, including deeds produced by AD.	3.50	675.00	\$2,362.50
06/24/2020	JIS	AA	Review email from A. Silverman regarding property searches and respond/forward to same.	0.10	675.00	\$67.50
06/24/2020	JIS	AA	Review 2018 property list.	0.20	675.00	\$135.00
06/24/2020	IDS	AA	Review various property schedules regarding discrepancies.	2.20	675.00	\$1,485.00
06/24/2020	IDS	AA	Email with James Stang regarding discrepancies in property lists.	0.20	675.00	\$135.00
06/29/2020	JIS	AA	Call with E. Mazel regarding property database.	0.20	675.00	\$135.00
				<b>22.40</b>		<b>\$15,120.00</b>

**Asset Disposition [B130]**

06/03/2020	JIS	AD	Review of emails regarding sale of house, including questions to Debtor regarding marketing, and email	0.60	675.00	\$405.00
------------	-----	----	--	------	--------	----------

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			to Committee and counsel re same.			
06/03/2020	IDS	AD	Review email and email and motion (draft) to sell Lamplighter property.	0.50	675.00	\$337.50
06/03/2020	IDS	AD	Email with Walker and stay regarding Lamplighter sale.	0.20	675.00	\$135.00
06/05/2020	IDS	AD	Review information regarding Lamplighter sale.	0.50	675.00	\$337.50
06/05/2020	IDS	AD	Email to James Stang regarding Lamplighter sale.	0.20	675.00	\$135.00
06/10/2020	JIS	AD	Call with T. Walker regarding sale of Lamplighter property and MLS listing and review email from T. Walker re same.	0.10	675.00	\$67.50
06/15/2020	IDS	AD	Telephone call with James Stang regarding real estate.	0.20	675.00	\$135.00
06/15/2020	IDS	AD	Follow up with Geltmare real estate list.	0.40	675.00	\$270.00
06/19/2020	JIS	AD	Call with Adam Silverman regarding real property sales.	0.70	675.00	\$472.50
06/23/2020	JIS	AD	Call with F. Elsaesser regarding real property schedules and comparison to other charts and status of real property disposition.	0.20	675.00	\$135.00
				<b>3.60</b>		<b>\$2,430.00</b>

#### Case Administration [B110]

06/26/2020	JIS	CA	Call with B. Hall regarding real property analysis and standing objection.	0.10	675.00	\$67.50
				<b>0.10</b>		<b>\$67.50</b>

#### Claims Admin/Objections[B310]

06/05/2020	JIS	CO	Call with Survivor Counsel regarding bar date and late filed proof of claim.	0.10	675.00	\$67.50
				<b>0.10</b>		<b>\$67.50</b>

#### General Creditors Comm. [B150]

06/03/2020	JIS	GC	Review letter regarding Committee process.	0.80	675.00	\$540.00
06/03/2020	IDS	GC	Telephone call with committee regarding mediation asset sales, stay extension.	0.60	675.00	\$405.00
06/03/2020	IDS	GC	Review letter from C. Nichols regarding committee communications.	0.50	675.00	\$337.50
06/05/2020	JIS	GC	State Court Counsel call regarding preliminary injunction, real property, offer and standing motion.	0.60	675.00	\$405.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/05/2020	IDS	GC	Attend Zoom meeting with SCC regarding mediation.	0.60	675.00	\$405.00
06/08/2020	JIS	GC	Call with creditor counsel regarding committee creditor constituency and status conference on chapter 11 case.	0.30	675.00	\$202.50
06/08/2020	JIS	GC	Call with B. Hall regarding status conference hearing.	0.10	675.00	\$67.50
06/09/2020	JIS	GC	Email for continuance of OCC meeting.	0.10	675.00	\$67.50
06/17/2020	JIS	GC	Call with committee regarding counteroffer and asset evaluation.	1.40	675.00	\$945.00
06/17/2020	JIS	GC	Call with Ilan Scharf regarding follow up issues from OCC call.	0.20	675.00	\$135.00
06/17/2020	IDS	GC	Telephone call with James Stag after committee call regarding next steps.	0.20	675.00	\$135.00
06/19/2020	JIS	GC	Call with B. Hall regarding upcoming call with all state court counsel.	0.20	675.00	\$135.00
06/19/2020	JIS	GC	Call with Survivors Counsel regarding meeting with all state court counsel and real property discovery.	0.50	675.00	\$337.50
06/19/2020	IDS	GC	Attend SCC meeting regarding property mediation.	1.00	675.00	\$675.00
06/21/2020	JIS	GC	Call with Survivors Counsel regarding committee duties.	2.00	675.00	\$1,350.00
06/24/2020	JIS	GC	Review bylaws and email to Committee re changes to same.	0.40	675.00	\$270.00
06/24/2020	JIS	GC	Call with Survivors Counsel re status of case including mediation and property analysis.	0.40	675.00	\$270.00
06/24/2020	JIS	GC	Call with C. Vernon regarding communications with state court counsel.	0.10	675.00	\$67.50
06/24/2020	JIS	GC	Letter to C. Nichols regarding Faddoul letter.	0.30	675.00	\$202.50
06/24/2020	JIS	GC	Call with Committee regarding committee structure and counteroffer timing.	1.40	675.00	\$945.00
06/24/2020	IDS	GC	Attend committee call regarding asset disclosures and mediation process.	1.40	675.00	\$945.00
06/25/2020	JIS	GC	Calls to counsel regarding ex officio vote by Committee.	0.40	675.00	\$270.00
06/25/2020	JIS	GC	Draft email to Committee and state court counsel regarding ex officio bylaw amendment.	0.30	675.00	\$202.50
06/26/2020	JIS	GC	Call with Survivors Counsel regarding real property, committee ex officio structure.	0.70	675.00	\$472.50
06/26/2020	IDS	GC	Attend counsel call.	0.80	675.00	\$540.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/29/2020	JIS	GC	Call with ex officio candidate.	0.50	675.00	\$337.50
				<b>15.80</b>		<b>\$10,665.00</b>

### Hearings

06/08/2020	JIS	H	Hearing regarding case status and status on stay relief.	0.70	675.00	\$472.50
06/08/2020	IDS	H	Telephone call with James Stang regarding hearing.	0.20	675.00	\$135.00
06/29/2020	JIS	H	Attend hearing regarding standing motion and automatic stay.	1.40	675.00	\$945.00
06/29/2020	GSG	H	Attend telephonic hearing re derivative standing; notes re same.	1.30	675.00	\$877.50
				<b>3.60</b>		<b>\$2,430.00</b>

### Insurance Coverage

06/01/2020	IAWN	IC	Review email from James I. Stang to debtor re asset information	0.10	675.00	\$67.50
06/02/2020	IAWN	IC	Review committee emails to James I Stang re agenda item for parish discovery and James I. Stang responses	0.20	675.00	\$135.00
06/03/2020	IAWN	IC	Review and analyze Hall strategy email	0.80	675.00	\$540.00
06/03/2020	IAWN	IC	Review Rothstein letter to committee	0.20	675.00	\$135.00
06/05/2020	IAWN	IC	Review and analyze cup documents from Murray	1.20	675.00	\$810.00
06/09/2020	IAWN	IC	Review new coverage chart from Murray, via Lisa Ford, compare differences	0.80	675.00	\$540.00
06/10/2020	IAWN	IC	Review mediator correspondence and Blumel email	0.10	675.00	\$67.50
06/10/2020	IAWN	IC	Exchange emails with Janice G Washington re charts created in October, review same	0.30	675.00	\$202.50
06/12/2020	IAWN	IC	Review proposed counter offer and hall email, (.3), review new coverage chart against same, (.1), draft lengthy email to James I Stang re necessary recalculation of max limits and application of ratios	1.30	675.00	\$877.50
06/12/2020	IAWN	IC	Exchange emails with James I Stang re timing of revised assessment of max limits	0.10	675.00	\$67.50
06/12/2020	IAWN	IC	Exchange emails with James I Stang, Monagle re draft letter re offer to committee from James I Stang	0.30	675.00	\$202.50
06/15/2020	IAWN	IC	Review file re origin of 212 max and analyze same	2.00	675.00	\$1,350.00
06/15/2020	IAWN	IC	Exchange emails with James I stang re documentation of 212 max	0.10	675.00	\$67.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/15/2020	IAWN	IC	Draft email explaining 212 max analysis and ratio's application	0.90	675.00	\$607.50
06/15/2020	IAWN	IC	Exchange emails with James I Stang re communicating with Hall	0.10	675.00	\$67.50
06/15/2020	IAWN	IC	Telephone conference with Ford re 212 analysis	0.50	675.00	\$337.50
06/15/2020	IAWN	IC	Exchange emails with James I Stang re chart and original October email to SCC	0.20	675.00	\$135.00
06/16/2020	IAWN	IC	Review and analyze Hall and Ford analyses re insurance and offer	0.80	675.00	\$540.00
06/16/2020	IAWN	IC	Review James I Stang email to committee with counter offer and explanation	0.40	675.00	\$270.00
06/17/2020	IAWN	IC	Review James I Stang email to TCC re counter offer and insurance ratio	0.10	675.00	\$67.50
06/28/2020	IAWN	IC	Review James I Stang email re standing motion and pending mediation	0.10	675.00	\$67.50
				<b>10.60</b>		<b>\$7,155.00</b>

### Mediation

06/23/2020	JIS	ME	Call with mediator regarding status of mediation and due diligence for same.	0.90	675.00	\$607.50
06/23/2020	JIS	ME	Call with Survivors Counsel and Ilan Scharf regarding mediation due diligence on assets.	0.70	675.00	\$472.50
06/30/2020	JIS	ME	Call with Survivors counsel re mediation issues for 7/15 mediation.	0.30	675.00	\$202.50
06/30/2020	JIS	ME	Call with B. Hall regarding gating issues for return to mediation.	0.30	675.00	\$202.50
				<b>2.20</b>		<b>\$1,485.00</b>

### Outgoing Claims Analysis

06/01/2020	GSG	OCA	Review state court complaint copy re triggering creditor.	0.20	675.00	\$135.00
06/01/2020	GSG	OCA	Confer with S. Lee re corrected exhibits to Brown Declaration and ECF error re legible filing stamp.	0.30	675.00	\$202.50
06/10/2020	KHB	OCA	Review notice of prelim hearing on standing motion and emails with G. Greenwood re same.	0.20	675.00	\$135.00
06/10/2020	GSG	OCA	Review docket and pleadings re standing motion and hearing.	0.30	675.00	\$202.50
06/15/2020	KHB	OCA	Email from debtor's counsel re extension of time to respond to standing motion (.1); emails with G.	0.40	675.00	\$270.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Greenwood re local rules and stipulation for briefing schedule (.2); emails with J. Stang re same (.1); telephone call with J. Stang re same.			
06/15/2020	GSG	OCA	Review LBR and call court clerk re reply briefing; confer with K. Brown re same	0.30	675.00	\$202.50
06/16/2020	IDS	OCA	Email to Ford regarding extension of deadline to respond to standing motion.	0.10	675.00	\$67.50
06/20/2020	KHB	OCA	Emails with J. Stang re stipulation re motion to extend time for Debtor to object to motion for standing.	0.20	675.00	\$135.00
06/24/2020	GSG	OCA	Emails re standing motion and status.	0.20	675.00	\$135.00
06/25/2020	KHB	OCA	Telephone call with J. Stang re preliminary hearing on motion for standing (.1); emails with Gail Greenwood re same (.1).	0.20	675.00	\$135.00
06/26/2020	JIS	OCA	Preliminary review of Parish opposition to standing motion.	0.50	675.00	\$337.50
06/26/2020	KHB	OCA	Review Parishes opposition to motion for standing.	1.60	675.00	\$1,080.00
06/26/2020	GSG	OCA	Emails re opposition and hearing status.	0.10	675.00	\$67.50
06/27/2020	GSG	OCA	Review opposition re derivative standing; notes re same.	1.70	675.00	\$1,147.50
06/27/2020	GSG	OCA	Brief review of cases cited by parish committee re objections to standing; notes re same.	0.50	675.00	\$337.50
06/28/2020	JIS	OCA	Review strategies for preliminary hearing on standing motion on presentation of legal and factual issues.	0.80	675.00	\$540.00
06/28/2020	JIS	OCA	Email to Committee and State Court Counsel regarding standing motion review.	0.40	675.00	\$270.00
06/28/2020	KHB	OCA	Review oppositions to motion for standing (2.5); confer with J. Stang re same and re status conference (.4); confer with G.Greenwood re reply brief to oppositions (.3).	3.20	675.00	\$2,160.00
06/28/2020	GSG	OCA	Confer with K. Brown re preliminary hearing and objections to standing.	0.20	675.00	\$135.00
06/29/2020	JIS	OCA	Prepare for standing preliminary hearing by reviewing parish and diocese oppositions.	2.00	675.00	\$1,350.00
06/29/2020	JIS	OCA	Call with B. Hall after standing motion re same.	0.20	675.00	\$135.00
06/29/2020	KHB	OCA	Confer with J. Stang in preparation for preliminary hearing on standing motion (.8); review motion and oppositions in preparation for preliminary hearing (1.0); A preliminary hearing on standing motion (1.3); confer J. Stang re same (.2).	3.30	675.00	\$2,227.50

				16.90		\$11,407.50
<b>Plan &amp; Disclosure Stmt. [B320]</b>						
06/04/2020	JIS	PD	Call with Survivors' counsel regarding status of Debtor's response to offer and standing motion.	0.50	675.00	\$337.50
06/05/2020	IAWN	PD	Review ASDF counteroffer	0.10	675.00	\$67.50
06/05/2020	JIS	PD	Call with mediator regarding status of offers and standing motion.	0.10	675.00	\$67.50
06/05/2020	JIS	PD	Review Archdiocese counteroffer letter.	0.20	675.00	\$135.00
06/08/2020	KHB	PD	Review debtor's response to settlement offer.	0.20	675.00	\$135.00
06/09/2020	JIS	PD	Call with Survivors' counsel re mediation counteroffer and strategy (1.), call with INasatir re insurance calculations (.2).	1.20	675.00	\$810.00
06/12/2020	IAWN	PD	Review charts re insurance coverage and need to update vv. Amended coverage chart	0.50	675.00	\$337.50
06/12/2020	JIS	PD	Call with Survivors Counsel regarding counteroffer to Archdiocese.	0.20	675.00	\$135.00
06/12/2020	JIS	PD	Call with L. Monagle regarding revisions to proposed counter offer.	0.10	675.00	\$67.50
06/12/2020	JIS	PD	Call with Iain Nasatir regarding insurance coverage issues relating to new counteroffer.	0.40	675.00	\$270.00
06/12/2020	JIS	PD	Draft counteroffer to ADSF and cover draft email to State Court Counsel and Committee.	0.70	675.00	\$472.50
06/12/2020	JIS	PD	Call with all State Court Counsel regarding mediation, sale of assets, counteroffer.	1.30	675.00	\$877.50
06/12/2020	IDS	PD	Attend SCC meeting regarding mediation.	1.10	675.00	\$742.50
06/13/2020	IAWN	PD	Review Hall and Jame I Stang emails re counter	0.20	675.00	\$135.00
06/13/2020	IAWN	PD	Review Jame I Stang proposed email to committee	0.20	675.00	\$135.00
06/15/2020	IAWN	PD	Review Linnenberger and McNichols emails re counter offer	0.60	675.00	\$405.00
06/15/2020	JIS	PD	Call with Brad hall regarding issues regarding counteroffer and asset analysis.	0.20	675.00	\$135.00
06/15/2020	JIS	PD	Call with A. Malott regarding counteroffer and future mediation.	0.30	675.00	\$202.50
06/15/2020	JIS	PD	Call with Brad Hall regarding counteroffer and underlying assumptions re same.	0.50	675.00	\$337.50
06/15/2020	JIS	PD	Call with Ilan Scharf re asset analysis for counteroffer review.	0.10	675.00	\$67.50
06/16/2020	JIS	PD	Call with FE regarding plan concepts.	0.50	675.00	\$337.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/16/2020	JIS	PD	Draft email to Committee with proposed counteroffer, including review of proposed counteroffer, Ilan Scharf re asset analysis, Paul L. re asset analysis.	1.70	675.00	\$1,147.50
06/17/2020	JIS	PD	Call with Ilan Scharf regarding mediation strategy and response to letter from Fadoul.	0.80	675.00	\$540.00
06/17/2020	IDS	PD	Telephone call with James Stang, B.Hall regarding valuation counter.	0.80	675.00	\$540.00
06/17/2020	IDS	PD	Attend committee call regarding counter offer.	1.40	675.00	\$945.00
06/17/2020	IDS	PD	Review S. Fadduol letter regarding mediation.	0.40	675.00	\$270.00
06/19/2020	JIS	PD	Call with all State Court Counsel regarding proposed counteroffer to Archdiocese offer.	1.20	675.00	\$810.00
				<b>15.50</b>		<b>\$10,462.50</b>

#### **Retention of Prof. [B160]**

06/24/2020	IDS	RP	Review application to retain appraiser.	0.40	675.00	\$270.00
06/24/2020	IDS	RP	Telephone call with James Stang regarding appraiser retention.	0.10	675.00	\$67.50
				<b>0.50</b>		<b>\$337.50</b>

#### **Stay Litigation [B140]**

06/03/2020	JIS	SL	Call with Ilan Scharf re conditions to parish stay.	0.20	675.00	\$135.00
06/03/2020	JIS	SL	Call with Ilan Scharf regarding response to motion for extension of 362 motion and parish/affiliate discovery in response.	0.30	675.00	\$202.50
06/03/2020	IDS	SL	Telephone call with James Stang regarding stay extension motion.	0.40	675.00	\$270.00
06/03/2020	IDS	SL	Review stay extension motion filed by debtor.	0.80	675.00	\$540.00
06/03/2020	IDS	SL	Review joinder to stay extension motion.	0.20	675.00	\$135.00
06/03/2020	IDS	SL	Review Paickattu motions (enforce stay)	0.50	675.00	\$337.50
06/03/2020	IDS	SL	Review motion to declare stay does not apply.	0.40	675.00	\$270.00
06/03/2020	IDS	SL	Review research file regarding stay extensions.	1.30	675.00	\$877.50
06/03/2020	IDS	SL	Email to SCC regarding stay extension.	0.40	675.00	\$270.00
06/04/2020	IDS	SL	Emails with K.C. Manierre regarding Parish stay motion.	0.20	675.00	\$135.00
06/26/2020	IDS	SL	Telephone conference with KC Mannierre regarding stay extension.	0.20	675.00	\$135.00



Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 13  
Invoice 125549  
June 30, 2020

---

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/26/2020	IDS	SL	Review stay extension pleadings.	0.80	675.00	\$540.00
				<u>5.70</u>		<u>\$3,847.50</u>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$65,475.00</b>

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 14  
Invoice 125549  
June 30, 2020

---

**Expenses**

06/30/2020 RS Research [E106]Everlaw, Inc. Inv. 28266

500.00

**Total Expenses for this Matter**

**\$500.00**

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 06/30/2020**

**Total Fees \$65,475.00**

**Total Expenses 500.00**

**Total Due on Current Invoice \$65,975.00**

**Outstanding Balance from prior invoices as of 06/30/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$38,840.82
123345	09/30/2019	\$23,355.00	\$10.10	\$23,365.10
124730	10/31/2019	\$44,688.50	\$685.56	\$45,374.06
124969	01/31/2020	\$198,857.50	\$4,949.13	\$203,806.63
125212	02/29/2020	\$229,550.00	\$5,024.17	\$234,574.17
125465	03/31/2020	\$49,632.50	\$2,118.58	\$51,751.08
125486	04/30/2020	\$27,742.50	\$908.67	\$28,651.17
125487	05/31/2020	\$85,545.00	\$500.00	\$86,045.00
125545	12/31/2019	\$37,482.50	\$1,240.04	\$38,722.54
125547	11/30/2019	\$100,575.00	\$9,556.08	\$110,131.08

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 16  
Invoice 125549  
June 30, 2020

---

**Total Amount Due on Current and Prior Invoices:**

**\$1,012,414.14**

# **Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

July 31, 2020

JIS

Invoice 126450

Client 05066

Matter 00002

**JIS**

RE: Committee Representation

---

## **STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 07/31/2020**

FEES	\$141,957.50
EXPENSES	\$1,546.61
LESS PREPAID APPLIED	\$107,853.68
<b>TOTAL CURRENT CHARGES</b>	<b>\$35,650.43</b>
<b>BALANCE FORWARD</b>	<b>\$1,012,414.14</b>
<b>LAST PAYMENT</b>	<b>\$701,888.93</b>
<b>TOTAL BALANCE DUE</b>	<b>\$346,175.64</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	94.70	\$63,922.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	3.60	\$2,430.00
IDS	Scharf, Ilan D.	Partner	675.00	10.00	\$6,750.00
JIS	Stang, James I.	Partner	675.00	23.90	\$16,132.50
KHB	Brown, Kenneth H.	Partner	675.00	76.30	\$51,502.50
LAF	Forrester, Leslie A.	Other	450.00	1.80	\$810.00
SEG	Goldich, Stanley E.	Partner	1025.00	0.40	\$410.00
				<hr/> 210.70	<hr/> \$141,957.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	6.10	\$4,117.50
AD	Asset Disposition [B130]	4.40	\$2,970.00
BL	Bankruptcy Litigation [L430]	171.30	\$115,627.50
CP	Compensation Prof. [B160]	0.30	\$202.50
GC	General Creditors Comm. [B150]	15.10	\$10,332.50
H	Hearings	1.30	\$877.50
IC	Insurance Coverage	3.70	\$2,497.50
ME	Mediation	7.20	\$4,455.00
PD	Plan & Disclosure Stmt. [B320]	1.30	\$877.50
		210.70	<hr/> \$141,957.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 126450  
July 31, 2020

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Bloomberg	\$136.40
Conference Call [E105]	\$435.51
CourtLink	\$22.70
Lexis/Nexis- Legal Research [E	\$361.50
Pacer - Court Research	\$15.00
Reproduction/ Scan Copy	\$75.50
Research [E106]	\$500.00
	<hr/>
	\$1,546.61



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
07/01/2020	JIS	AA	Call with F. Elsaesser regarding real property list.	0.40	675.00	\$270.00
07/02/2020	JIS	AA	Call with Ford E. regarding property reconciliation.	0.50	675.00	\$337.50
07/02/2020	JIS	AA	Email to Committee regarding status of real estate discussions with F. Elsaesser.	0.20	675.00	\$135.00
07/08/2020	IDS	AA	Initial review of property reconciliation.	0.20	675.00	\$135.00
07/08/2020	IDS	AA	Telephone call with James Stang regarding property reconciliation.	0.20	675.00	\$135.00
07/23/2020	IDS	AA	Review email from P. Linnenberger regarding asset sales.	0.20	675.00	\$135.00
07/23/2020	IDS	AA	Analysis of Debtor's property spreadsheet.	4.40	675.00	\$2,970.00
				<b>6.10</b>		<b>\$4,117.50</b>
<b>Asset Disposition [B130]</b>						
07/16/2020	JIS	AD	Call with Broker and accompanying emails regarding purchase offer.	0.40	675.00	\$270.00
07/17/2020	JIS	AD	Call Brad Hall re real estate offer.	0.20	675.00	\$135.00
07/20/2020	JIS	AD	Call with broker regarding purchase of ADSF properties.	0.20	675.00	\$135.00
07/22/2020	JIS	AD	Call with Ortero counsel regarding case background regarding real property title and sales.	0.50	675.00	\$337.50
07/22/2020	JIS	AD	Review listing agreement/sales analysis regarding three properties.	0.50	675.00	\$337.50
07/22/2020	JIS	AD	Review IHRC materials and email to Otero re same.	0.50	675.00	\$337.50
07/22/2020	JIS	AD	Draft email to FE regarding real property issues.	0.50	675.00	\$337.50
07/23/2020	JIS	AD	Review background info on prospective purchaser.	0.20	675.00	\$135.00
07/23/2020	JIS	AD	Call with G. Gallegos re IHRC and review info re same.	0.70	675.00	\$472.50
07/24/2020	JIS	AD	Call Ed Mazel regarding asset sales.	0.10	675.00	\$67.50
07/29/2020	JIS	AD	Call broker re status of offers.	0.10	675.00	\$67.50
07/30/2020	JIS	AD	Call Ford Elsaesser re real estate status.	0.40	675.00	\$270.00
07/30/2020	JIS	AD	Call Otero broker re offer on retreat center.	0.10	675.00	\$67.50
				<b>4.40</b>		<b>\$2,970.00</b>

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Bankruptcy Litigation [L430]</b>						
07/01/2020	JIS	BL	Call with Ken Brown regarding work on updating and responding to standing motion legal objections.	0.10	675.00	\$67.50
07/01/2020	KHB	BL	Work on reply brief to opposition to standing motion-RFRA (1.2); confer with J. Stang re same (.1).	1.30	675.00	\$877.50
07/02/2020	KHB	BL	Confer with J. Stang re reply brief to opposition to motion for standing (.1); review RFRA authorities re same (.2); emails from J. Stang re property transfers reconciliation by ADSF (.1).	0.40	675.00	\$270.00
07/03/2020	KHB	BL	Review RFRA authorities re preparation of reply to opposition to standing motion.	1.50	675.00	\$1,012.50
07/06/2020	KHB	BL	Work on Reply Brief to opposition to motion for standing-RFRA and First Amendment analysis (2.5); review additional exhibits filed by Parishes and emails re same from Gail Greenwood (.2).	2.70	675.00	\$1,822.50
07/06/2020	GSG	BL	Review Debtor's objection to Committee standing re legal issues; review additional cases re Cybergenics and majority approach post-Hartford.	4.10	675.00	\$2,767.50
07/06/2020	GSG	BL	Receive/review amended Fox Declaration/exhibits in opposition to standing.	0.10	675.00	\$67.50
07/07/2020	KHB	BL	Work on reply to opposition to motion for standing and analyze authority re RFRA and First Amendment (4.4); confer with G. Greenwood re other aspect of reply (.2).	4.60	675.00	\$3,105.00
07/07/2020	GSG	BL	Confer with K. Brown re standing and briefing.	0.30	675.00	\$202.50
07/07/2020	GSG	BL	Review ADSF briefing re unincorporated associations; notes re same.	2.30	675.00	\$1,552.50
07/07/2020	GSG	BL	Review/research case law re application of unincorporated association statute.	3.50	675.00	\$2,362.50
07/08/2020	KHB	BL	Work on reply to oppositions to motion for standing, analyze authorities re RFRA and First Amendment re same.	3.40	675.00	\$2,295.00
07/08/2020	GSG	BL	Review issues re certification of trust and filing of statement as unincorporated association.	2.40	675.00	\$1,620.00
07/09/2020	KHB	BL	Review proposed counter offer and emails from Committee re same.	0.30	675.00	\$202.50
07/13/2020	KHB	BL	Review emails from Debtor's counsel re amended list of real property (.2); emails with G. Greenwood re impact of revised lists on proposed avoidance complaints (.2).	0.40	675.00	\$270.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/13/2020	GSG	BL	Review email and attachments re reconciliation of real property lists.	1.00	675.00	\$675.00
07/14/2020	GSG	BL	Research and prepare arguments re reply to derivative standing.	3.70	675.00	\$2,497.50
07/15/2020	KHB	BL	Work on reply to oppositions to motion for standing (RFRA and First Amendment) (3.4); emails with G. Greenwood re opposition based on other other legal issues identified at status conference (.2).	3.60	675.00	\$2,430.00
07/15/2020	GSG	BL	Draft reply re derivative standing and 10th Circuit cases.	9.70	675.00	\$6,547.50
07/16/2020	KHB	BL	Work on reply to oppositions to motion for standing (RFRA and First Amendment issues).	5.30	675.00	\$3,577.50
07/16/2020	GSG	BL	Draft reply re derivative standing.	10.60	675.00	\$7,155.00
07/17/2020	KHB	BL	Work on reply to opposition to motion for standing (RFRA/First Amendment).	4.50	675.00	\$3,037.50
07/20/2020	KHB	BL	Review revised real property list and emails with G. Greenwood re same (.2); work on reply to opposition to motion for standing-RFRA and First Amendment issues (6.4).	6.60	675.00	\$4,455.00
07/20/2020	GSG	BL	Review amended Luna Dec re Rio Grande purchase/construction.	0.30	675.00	\$202.50
07/20/2020	GSG	BL	Review new spreadsheet from ADSF re property transfers; notes and email re same.	1.40	675.00	\$945.00
07/21/2020	KHB	BL	Work on reply to opposition to motion for standing (6.8); review supplemental declaration in support of parish opposition to motion for standing (.2).	7.00	675.00	\$4,725.00
07/21/2020	GSG	BL	Research/outline issues re unincorporated associations.	6.80	675.00	\$4,590.00
07/21/2020	GSG	BL	Review additional emails re related research.	0.20	675.00	\$135.00
07/21/2020	GSG	BL	Begin draft of reply re derivative standing and law governing unincorporated associations.	1.10	675.00	\$742.50
07/22/2020	KHB	BL	Work on reply to opposition to standing motion (5.3); review multiple declarations and exhibits filed in opposition to standing motion (1.6); confer with J. Stang in preparation for status conference (.2)	7.10	675.00	\$4,792.50
07/22/2020	GSG	BL	Research re Restatement of Trusts and citations by ADSF re reply to standing.	1.60	675.00	\$1,080.00
07/22/2020	GSG	BL	Draft reply re unincorporated associations.	5.60	675.00	\$3,780.00
07/23/2020	JIS	BL	Call Ken Brown re briefing for final hearing on standing.	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/23/2020	KHB	BL	Review oppositions to standing motion in preparation for status conference (1.2); prepare email re legal and factual issues (.6); confer with J. Stang in preparation for status conference (.2); attend status conference (1.3); confer with G. Greenwood re briefing schedule and hearing date for reply brief (.2)	3.50	675.00	\$2,362.50
07/23/2020	GSG	BL	Research re Revised Uniform Unincorp Nonprofit Act; review arguments and cases cited by Parish Steering Committee re unincorporated associations.	2.10	675.00	\$1,417.50
07/23/2020	GSG	BL	Review Amended Luna Dec and related declarations in opposition to standing.	0.70	675.00	\$472.50
07/23/2020	GSG	BL	Draft reply re NMSA application to unincorporated associations.	4.70	675.00	\$3,172.50
07/24/2020	KHB	BL	Work on reply to opposition to standing motion.	1.80	675.00	\$1,215.00
07/24/2020	GSG	BL	Research NM cases cited re resulting trusts; notes re same.	1.30	675.00	\$877.50
07/24/2020	GSG	BL	Draft/revise reply re unincorporated associations and trusts.	6.60	675.00	\$4,455.00
07/24/2020	GSG	BL	Emails to/from K. Brown re complaints.	0.10	675.00	\$67.50
07/27/2020	KHB	BL	Review debtor's mediation counter offer (.2); work on reply to oppositions to motion for standing (5.2).	5.40	675.00	\$3,645.00
07/27/2020	GSG	BL	Draft reply re unincorporated associations and resulting trust law.	4.40	675.00	\$2,970.00
07/27/2020	GSG	BL	Review ADSF spreadsheet re complaints; confer with M. Renck re exhibit and identification of representative parishes.	0.90	675.00	\$607.50
07/27/2020	GSG	BL	Draft/revise complaints re RE Trust and 544(a)(3) interests; review documents and confirm allegations re Community Garden properties.	1.60	675.00	\$1,080.00
07/28/2020	GSG	BL	Draft/revise reply inserts re standing and unincorporated association statute; review additional case law re same.	5.50	675.00	\$3,712.50
07/29/2020	KHB	BL	Work on reply to oppositions to motion for standing.	6.50	675.00	\$4,387.50
07/29/2020	GSG	BL	Review K. Brown comments and revise/draft reply re standing.	1.20	675.00	\$810.00
07/29/2020	GSG	BL	Review spreadsheet re representative parishes and review secretary of state information re same; revise RE Trust complaint re parish defendants.	1.40	675.00	\$945.00
07/30/2020	KHB	BL	Work on reply brief to opposition to motion for standing.	6.00	675.00	\$4,050.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/30/2020	GSG	BL	Review K. Brown comments and revise/draft reply re unincorporated association arguments.	1.60	675.00	\$1,080.00
07/30/2020	GSG	BL	Review spreadsheet re representative parishes of 544(a)(3) action and review secretary of state information re same; revise complaint re unrecorded interests and parish defendants.	1.70	675.00	\$1,147.50
07/30/2020	GSG	BL	Review/revise consolidated reply re standing; blackline and email comments re same.	6.20	675.00	\$4,185.00
07/31/2020	KHB	BL	Work on reply to opposition to motion for standing.	4.40	675.00	\$2,970.00
				<b>171.30</b>		<b>\$115,627.50</b>

**Compensation Prof. [B160]**

07/22/2020	JIS	CP	Review March prebill.	0.10	675.00	\$67.50
07/27/2020	JIS	CP	Review June bill.	0.20	675.00	\$135.00
				<b>0.30</b>		<b>\$202.50</b>

**General Creditors Comm. [B150]**

07/01/2020	JIS	GC	Review bylaws and transmit to counsel for review on confidentiality.	0.20	675.00	\$135.00
07/01/2020	JIS	GC	Committee meeting regarding BCT hearing and status of mediation.	1.20	675.00	\$810.00
07/01/2020	IDS	GC	Attend committee call regarding ex official member.	1.20	675.00	\$810.00
07/03/2020	JIS	GC	Meeting with Survivors counsel regarding real property and mediation.	0.60	675.00	\$405.00
07/07/2020	JIS	GC	Call from B. Hall regarding status of real property review and mediation scheduling.	0.10	675.00	\$67.50
07/07/2020	JIS	GC	Call with ex officio committee member re case status.	0.50	675.00	\$337.50
07/08/2020	JIS	GC	Email to Committee re agenda for 7/8 meeting including review of text message from Debtor re property reconciliation.	0.30	675.00	\$202.50
07/08/2020	JIS	GC	Call with B. Hall re 7/8 meeting and agenda and impact of bankruptcy on 3d party SOLS.	0.30	675.00	\$202.50
07/08/2020	JIS	GC	Committee call regarding mediation, counter offer and real property issues.	1.50	675.00	\$1,012.50
07/08/2020	IDS	GC	Attend committee call regarding mediation.	1.90	675.00	\$1,282.50
07/10/2020	JIS	GC	Call with State Court Counsel regarding counteroffer, real estate status, PPP loans.	0.70	675.00	\$472.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/10/2020	JIS	GC	Call with survivors counsel regarding issues related to Committee communications.	0.20	675.00	\$135.00
07/10/2020	SEG	GC	Review James I. Stang emails regarding Committee issues and Bylaw confidentiality provisions and review Bylaws and email to James I. Stang regarding same.	0.40	1025.00	\$410.00
07/15/2020	JIS	GC	Call with Vito De la Cruz regarding Committee process issues.	0.40	675.00	\$270.00
07/15/2020	JIS	GC	Committee call regarding insurance, standing litigation, plan issues.	1.10	675.00	\$742.50
07/20/2020	JIS	GC	Call with Brad Hall regarding call with Anderson and broker.	0.40	675.00	\$270.00
07/22/2020	JIS	GC	Preparation for committee call by reviewing all real property emails and review status for standing preliminary hearing.	0.60	675.00	\$405.00
07/22/2020	JIS	GC	Call with Committee regarding sales and 7/23 hearing.	0.80	675.00	\$540.00
07/24/2020	JIS	GC	Conference call with Survivors Counsel regarding preliminary hearing on standing motion and asset sales.	0.70	675.00	\$472.50
07/24/2020	IDS	GC	Attend SCC call regarding mediation.	0.50	675.00	\$337.50
07/29/2020	JIS	GC	Call Brad Hall regarding agenda for 7/29 meeting.	0.20	675.00	\$135.00
07/31/2020	JIS	GC	Call with state court counsel regarding mediation and asset disposition.	0.50	675.00	\$337.50
07/31/2020	IDS	GC	Attend meeting with SCC regarding property analysis, mediation.	0.80	675.00	\$540.00
				<b>15.10</b>		<b>\$10,332.50</b>

### Hearings

07/23/2020	JIS	H	Attend preliminary hearing regarding standing motion.	1.30	675.00	\$877.50
				<b>1.30</b>		<b>\$877.50</b>

### Insurance Coverage

07/09/2020	IAWN	IC	Review Linnenberger email re enforcing arbitration (.3), analyze and draft responsive email to James I Stang re same (.5)	0.80	675.00	\$540.00
07/10/2020	IAWN	IC	Telephone conference with Murray re CM pool	0.10	675.00	\$67.50
07/10/2020	IAWN	IC	Review CM pool documentation (.8), email to James	0.90	675.00	\$607.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			I Stang re CM pool (.1)			
07/10/2020	IAWN	IC	Review James I Stang mediation emails	0.30	675.00	\$202.50
07/10/2020	IAWN	IC	Review Hall, Monagle and Linnenberger emails on global arbitration	0.60	675.00	\$405.00
07/14/2020	IAWN	IC	Review Malott email re mediation and attachment	0.10	675.00	\$67.50
07/15/2020	IAWN	IC	Review James I Stang email re arbitration, send email re same	0.10	675.00	\$67.50
07/16/2020	IAWN	IC	Review TNCRRG financials (.3), email Murray re ASDF involvement (.1)	0.40	675.00	\$270.00
07/17/2020	IAWN	IC	Review email from Murray re TNCRRG and ADSF	0.10	675.00	\$67.50
07/20/2020	JIS	IC	Call with Iain Nasatir regarding theories for increased recovery from insurers.	0.10	675.00	\$67.50
07/27/2020	IAWN	IC	Review emails from James I Stang re mediation dates	0.10	675.00	\$67.50
07/27/2020	IAWN	IC	Review ADSF counter offer	0.10	675.00	\$67.50
				<b>3.70</b>		<b>\$2,497.50</b>

### Mediation

07/01/2020	LAF	ME	Locate ADOM briefs.	1.80	450.00	\$810.00
07/03/2020	JIS	ME	Email to Malott regarding mediation session and email with C. Montoya re same.	0.20	675.00	\$135.00
07/09/2020	JIS	ME	Review counteroffer and draft revisions from 7/8 committee hearing.	0.70	675.00	\$472.50
07/09/2020	IDS	ME	Attend counsel call via Zoom regarding mediation.	0.60	675.00	\$405.00
07/10/2020	JIS	ME	Call with B. Hall regarding mediation issues related to insurance.	0.10	675.00	\$67.50
07/10/2020	JIS	ME	Draft response to mediator email regarding counteroffer.	0.30	675.00	\$202.50
07/14/2020	JIS	ME	Call with A. Malott regarding Diocese response to OCC counter offer.	0.40	675.00	\$270.00
07/14/2020	JIS	ME	Call with B. Hall regarding Archdiocese response to counteroffer.	0.30	675.00	\$202.50
07/15/2020	JIS	ME	Call with B. Hall re response to Debtor's correspondence on counteroffer.	0.60	675.00	\$405.00
07/18/2020	JIS	ME	Review status of mediation with KBrown and review email from mediator and forward.	0.30	675.00	\$202.50
07/20/2020	JIS	ME	Call with Bruce Anderson regarding counteroffer and continued mediation.	0.40	675.00	\$270.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2020	JIS	ME	Call with F. Elsaesser regarding status of mediation and counteroffers.	0.40	675.00	\$270.00
07/23/2020	JIS	ME	Call with Brad Hall regarding outcome of the preliminary hearing on standing and mediation issues.	0.40	675.00	\$270.00
07/23/2020	JIS	ME	Call with Mediator regarding offers and hearing on 7/23.	0.20	675.00	\$135.00
07/29/2020	JIS	ME	Emails regarding state statute of limitations per mediator concerns.	0.50	675.00	\$337.50
				<u>7.20</u>		<u>\$4,455.00</u>
<b>Plan &amp; Disclosure Stmt. [B320]</b>						
07/27/2020	JIS	PD	Call with State Court Counsel regarding status of case and mediation.	0.20	675.00	\$135.00
07/29/2020	JIS	PD	Review Debtor's counteroffer and real property discussion.	0.50	675.00	\$337.50
07/29/2020	JIS	PD	Call with Committee regarding counter offer and mediation.	0.60	675.00	\$405.00
				<u>1.30</u>		<u>\$877.50</u>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$141,957.50</b>



---

**Expenses**

06/03/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	31.23
06/08/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	15.87
06/12/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	1.93
06/17/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.07
06/17/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	101.10
06/24/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	89.33
06/29/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	34.92
07/01/2020	BB	05066.00002 Bloomberg Charges for 08-06-20	136.40
07/01/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.08
07/07/2020	LN	05066.00002 Lexis Charges for 07-07-20	9.19
07/07/2020	RE2	SCAN/COPY ( 244 @0.10 PER PG)	24.40
07/07/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
07/07/2020	RE2	SCAN/COPY ( 93 @0.10 PER PG)	9.30
07/07/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
07/07/2020	RE2	SCAN/COPY ( 90 @0.10 PER PG)	9.00
07/07/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
07/07/2020	RE2	SCAN/COPY ( 54 @0.10 PER PG)	5.40

---

07/07/2020	RE2	SCAN/COPY ( 43 @0.10 PER PG)	4.30
07/07/2020	RE2	SCAN/COPY ( 62 @0.10 PER PG)	6.20
07/08/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	118.35
07/14/2020	LN	05066.00002 Lexis Charges for 07-14-20	44.52
07/14/2020	RE2	SCAN/COPY ( 54 @0.10 PER PG)	5.40
07/14/2020	RE2	SCAN/COPY ( 33 @0.10 PER PG)	3.30
07/14/2020	RE2	SCAN/COPY ( 62 @0.10 PER PG)	6.20
07/15/2020	LN	05066.00002 Lexis Charges for 07-15-20	18.39
07/16/2020	LN	05066.00002 Lexis Charges for 07-16-20	36.78
07/20/2020	LN	05066.00002 Lexis Charges for 07-20-20	88.66
07/21/2020	LN	05066.00002 Lexis Charges for 07-21-20	9.21
07/22/2020	LN	05066.00002 Lexis Charges for 07-22-20	9.21
07/22/2020	LN	05066.00002 Lexis Charges for 07-22-20	44.32
07/23/2020	LN	05066.00002 Lexis Charges for 07-23-20	92.01
07/27/2020	LN	05066.00002 Lexis Charges for 07-27-20	9.21
07/29/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	42.63
07/30/2020	CL	05066.00002 CourtLink charges for 07-30-20	22.70
07/31/2020	PAC	Pacer - Court Research	15.00

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 15  
Invoice 126450  
July 31, 2020

---

07/31/2020 RS Research [E106] Everlaw, Inc. Inv. 29114

500.00

**Total Expenses for this Matter**

**\$1,546.61**

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 07/31/2020**

**Total Fees** **\$141,957.50**

**Total Expenses** **1,546.61**

**Total Due on Current Invoice** **\$35,650.43**

**Outstanding Balance from prior invoices as of 07/31/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 17  
Invoice 126450  
July 31, 2020

---

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
--------	------------	-------------	----------	-------------

**Total Amount Due on Current and Prior Invoices:**

**\$346,175.64**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

August 31, 2020

Invoice 126765

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 08/31/2020**

FEES	\$71,419.50
EXPENSES	\$876.72
<b>TOTAL CURRENT CHARGES</b>	<b>\$72,296.22</b>
<b>BALANCE FORWARD</b>	<b>\$346,175.64</b>
<b>TOTAL BALANCE DUE</b>	<b>\$418,471.86</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
CAK	Knotts, Cheryl A.	Paralegal	395.00	6.60	\$2,607.00
GSG	Greenwood, Gail S.	Counsel	675.00	21.50	\$14,512.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	6.40	\$4,320.00
IDS	Scharf, Ilan D.	Partner	675.00	12.00	\$8,100.00
JIS	Stang, James I.	Partner	675.00	16.30	\$11,002.50
KHB	Brown, Kenneth H.	Partner	675.00	32.80	\$22,140.00
LAF	Forrester, Leslie A.	Other	450.00	0.30	\$135.00
WLR	Ramseyer, William L.	Counsel	775.00	11.10	\$8,602.50
				<hr/> 107.00	<hr/> \$71,419.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition [B130]	0.80	\$540.00
BL	Bankruptcy Litigation [L430]	56.90	\$38,340.00
CP	Compensation Prof. [B160]	17.80	\$11,277.00
GC	General Creditors Comm. [B150]	7.90	\$5,332.50
H	Hearings	1.00	\$675.00
IC	Insurance Coverage	6.40	\$4,320.00
ME	Mediation	13.70	\$9,247.50
RP	Retention of Prof. [B160]	2.00	\$1,350.00
RPO	Ret. of Prof./Other	0.50	\$337.50
		107.00	<hr/> \$71,419.50



Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 126765  
August 31, 2020

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$176.62
Federal Express [E108]	\$17.61
Lexis/Nexis- Legal Research [E	\$64.49
Pacer - Court Research	\$47.40
Postage [E108]	\$2.20
Reproduction/ Scan Copy	\$68.40
Research [E106]	\$500.00
	<hr/>
	\$876.72

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Disposition [B130]</b>						
08/14/2020	IDS	AD	Review press regarding property sales.	0.40	675.00	\$270.00
08/14/2020	IDS	AD	Email to/from Ford E. regarding asset sales.	0.20	675.00	\$135.00
08/25/2020	JIS	AD	Review docket for entries related to sales of real property.	0.10	675.00	\$67.50
08/27/2020	JIS	AD	Email to FE regarding property status.	0.10	675.00	\$67.50
				<b>0.80</b>		<b>\$540.00</b>

<b>Bankruptcy Litigation [L430]</b>						
08/04/2020	JIS	BL	Review reply brief on standing motion.	1.00	675.00	\$675.00
08/05/2020	JIS	BL	Review additional edits to reply brief on standing.	0.20	675.00	\$135.00
08/05/2020	KHB	BL	Work on reply to opposition to standing motion (3.4); confer with J. Stang re same (.3); review recent RFRA authority from NM district court (.5).	4.20	675.00	\$2,835.00
08/05/2020	LAF	BL	Legal research re: RFRA briefs.	0.30	450.00	\$135.00
08/05/2020	GSG	BL	Review/revise reply brief re final edits.	3.40	675.00	\$2,295.00
08/06/2020	KHB	BL	Work on reply to opposition to motion to dismiss.	1.40	675.00	\$945.00
08/06/2020	GSG	BL	Revise and finalize reply brief and tables/citations for final filing.	3.90	675.00	\$2,632.50
08/07/2020	GSG	BL	Confer re reply brief efilng and review same.	0.10	675.00	\$67.50
08/08/2020	JIS	BL	Review emails regarding discovery for dismissal motion.	0.50	675.00	\$337.50
08/17/2020	KHB	BL	Prepare for hearing on standing motion.	0.60	675.00	\$405.00
08/18/2020	KHB	BL	Confer with J. Stang re mediation impasse and strategy for litigation on behalf of estate and standing motion (.3); emails to G. Greenwood re finalizing complaints (.1).	0.40	675.00	\$270.00
08/19/2020	GSG	BL	Review/revise adversary complaints and exhibits; emails to K. Brown re same.	3.10	675.00	\$2,092.50
08/20/2020	JIS	BL	Call with Ken Brown re calls with clerk regarding hearing process.	0.20	675.00	\$135.00
08/20/2020	KHB	BL	Telephone call with court clerk re hearing logistics for standing motion (.2); confer with J. Stang re same (.2).	0.40	675.00	\$270.00
08/24/2020	KHB	BL	Prepare for hearing on motion for standing and review briefs re same.	2.50	675.00	\$1,687.50
08/24/2020	GSG	BL	Review case analysis re discovery issues; notes re	1.20	675.00	\$810.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			same.			
08/25/2020	KHB	BL	Prepare for hearing on standing motion and review briefs, evidence and legal authorities re same.	5.50	675.00	\$3,712.50
08/25/2020	GSG	BL	Review and analyze certifications of trust, timing, and unrecorded parish interests.	1.10	675.00	\$742.50
08/25/2020	GSG	BL	Emails re preparation for standing hearing.	0.20	675.00	\$135.00
08/26/2020	KHB	BL	Prepare for hearing on standing motion and review pleadings and authorities re same.	2.60	675.00	\$1,755.00
08/27/2020	KHB	BL	Preparation for oral argument for standing motion, review briefs and authorities and prepare outline for argument.	7.80	675.00	\$5,265.00
08/28/2020	JIS	BL	Review Parish supplement and Milwaukee standing case.	0.30	675.00	\$202.50
08/28/2020	JIS	BL	Post hearing recap with Brad Hall and Ken Brown.	0.30	675.00	\$202.50
08/28/2020	KHB	BL	Prepare for hearing on standing motion (2.8); review supplement filed by parishes and prepare response to same (.7); attend hearing on standing motion (3.2); confer with J. Stang re same (.3).	7.00	675.00	\$4,725.00
08/28/2020	GSG	BL	Review reply and supplement in preparation for hearing on standing motion.	0.60	675.00	\$405.00
08/28/2020	GSG	BL	Research re 10th Circuit good faith defense.	1.20	675.00	\$810.00
08/28/2020	GSG	BL	Attend hearing (truncated) re standing motion.	2.40	675.00	\$1,620.00
08/28/2020	GSG	BL	Review finance committee meeting minutes re restructuring issues.	0.50	675.00	\$337.50
08/31/2020	KHB	BL	Confer with G. Greenwood re results of hearing on standing motion.	0.20	675.00	\$135.00
08/31/2020	GSG	BL	Review database re meeting minutes and timeline; draft initial discovery list.	3.80	675.00	\$2,565.00
				<b>56.90</b>		<b>\$38,340.00</b>

**Compensation Prof. [B160]**

08/03/2020	JIS	CP	Call W. Ramseyer regarding preparation of bills.	0.10	675.00	\$67.50
08/03/2020	WLR	CP	Telephone call to James Stang re fee application timing and procedures	0.20	775.00	\$155.00
08/04/2020	CAK	CP	Beginning spreadsheet to prepare tables to summarize bills	1.20	395.00	\$474.00
08/05/2020	CAK	CP	Update spreadsheet to prepare tables to summarize bills	1.80	395.00	\$711.00
08/05/2020	CAK	CP	Begin drafting tables to summarize bills	0.20	395.00	\$79.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/06/2020	CAK	CP	Complete summary charts of fee applications.	0.60	395.00	\$237.00
08/06/2020	WLR	CP	Correspondence to Cheryl Knotts re fee application background documents	0.20	775.00	\$155.00
08/07/2020	WLR	CP	Review correspondence from Cheryl Knotts re 2nd interim fee application	0.20	775.00	\$155.00
08/12/2020	WLR	CP	Draft 2nd interim fee application	2.30	775.00	\$1,782.50
08/14/2020	WLR	CP	Draft 2nd interim fee application	4.20	775.00	\$3,255.00
08/16/2020	WLR	CP	Draft 2nd interim fee application	2.10	775.00	\$1,627.50
08/20/2020	WLR	CP	Review and revise second interim fee application	0.30	775.00	\$232.50
08/21/2020	WLR	CP	Review and revise Second interim fee application	1.50	775.00	\$1,162.50
08/21/2020	WLR	CP	Review correspondence from James Stang re July 2020 invoice and reply re same	0.10	775.00	\$77.50
08/24/2020	CAK	CP	Review and update 2nd Interim fee application; draft exhibits to same.	2.40	395.00	\$948.00
08/24/2020	CAK	CP	Update spreadsheet in preparation of 2nd Interim fee application	0.40	395.00	\$158.00
				<b>17.80</b>		<b>\$11,277.00</b>

**General Creditors Comm. [B150]**

08/05/2020	JIS	GC	Call survivor regarding status of chapter 11 case.	0.10	675.00	\$67.50
08/05/2020	JIS	GC	Call with Committee regarding mediation, property sales and standing litigation.	0.70	675.00	\$472.50
08/07/2020	IDS	GC	Attend counsel call.	0.80	675.00	\$540.00
08/12/2020	JIS	GC	Call with B. Hall regarding agenda for 8/12 Committee meeting.	0.50	675.00	\$337.50
08/12/2020	JIS	GC	Call with Committee regarding mediation.	1.50	675.00	\$1,012.50
08/14/2020	IDS	GC	Attend SCC call.	0.80	675.00	\$540.00
08/19/2020	JIS	GC	Call with State Court Counsel and email to Committee re meeting and status.	0.20	675.00	\$135.00
08/21/2020	JIS	GC	Attend state court counsel meeting regarding real estate issues, status of mediation, standing motion, plan concepts.	1.50	675.00	\$1,012.50
08/21/2020	IDS	GC	Attend SCC call. (partial)	1.30	675.00	\$877.50
08/27/2020	JIS	GC	Call F. Elsaesser regarding real property report and mediation status.	0.20	675.00	\$135.00
08/28/2020	JIS	GC	Call with Brad Hall re standing hearing, mediation status.	0.10	675.00	\$67.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/28/2020	JIS	GC	Call Brad Hall regarding status of mediation and standing hearing.	0.20	675.00	\$135.00
				<u>7.90</u>		<u>\$5,332.50</u>

### Hearings

08/28/2020	JIS	H	Attend hearing re standing motion and status conference.	1.00	675.00	\$675.00
				<u>1.00</u>		<u>\$675.00</u>

### Insurance Coverage

08/11/2020	IAWN	IC	Exchange emails with Linnberger re analysis of coverage	0.40	675.00	\$270.00
08/11/2020	IAWN	IC	Review emails re ratio offer and draft explanation re same	0.80	675.00	\$540.00
08/12/2020	IAWN	IC	Review Linnenberger email re coverage and assumptions and analyze, and comment re same to James I Stang, Ilan Scharf, Hall, Monagle and Ford	1.20	675.00	\$810.00
08/12/2020	IAWN	IC	Review Linnneberger email re sausage making	0.20	675.00	\$135.00
08/17/2020	IAWN	IC	Review Fadduol settlement hypotheticals and analyze,review coverage chart, perp and survivor charts, policy counts, provide lengthy explanation to James I Stang re same	3.80	675.00	\$2,565.00
				<u>6.40</u>		<u>\$4,320.00</u>

### Mediation

08/07/2020	JIS	ME	Call with State Court Counsel regarding mediation strategy.	0.70	675.00	\$472.50
08/10/2020	IDS	ME	Review memo regarding mediation briefs.	1.00	675.00	\$675.00
08/11/2020	IDS	ME	Attend zoom pre-mediation session.	0.50	675.00	\$337.50
08/12/2020	JIS	ME	Call with J. Murray regarding mediation issues and insurance coverage.	0.30	675.00	\$202.50
08/12/2020	JIS	ME	Call with Ilan Scharf regarding ADSF mediation issues.	0.30	675.00	\$202.50
08/12/2020	KHB	ME	Review emails re mediation strategy.	0.20	675.00	\$135.00
08/14/2020	JIS	ME	Call with State Court Counsel regarding real property and mediation strategies.	1.30	675.00	\$877.50
08/17/2020	JIS	ME	Attend mediation opening and first counteroffer.	0.80	675.00	\$540.00
08/17/2020	JIS	ME	Call with Ilan Scharf re insurance issues in	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			mediation.			
08/17/2020	JIS	ME	Review status of mediation offers with Ilan Scharf.	0.10	675.00	\$67.50
08/17/2020	JIS	ME	Call with Mediator in mediation session.	2.40	675.00	\$1,620.00
08/17/2020	IDS	ME	Attend mediation.	3.50	675.00	\$2,362.50
08/17/2020	IDS	ME	Telephone conference with Jim Stang regarding mediation.	0.20	675.00	\$135.00
08/18/2020	JIS	ME	Call L. James re background and mediation status.	0.60	675.00	\$405.00
08/18/2020	JIS	ME	Call with Ken Brown regarding status of mediation.	0.80	675.00	\$540.00
08/28/2020	IDS	ME	Attend SCC call regarding mediation.	0.80	675.00	\$540.00
				<u>13.70</u>		<u>\$9,247.50</u>

**Retention of Prof. [B160]**

08/26/2020	IDS	RP	Email to SCC regarding accountant retention.	0.40	675.00	\$270.00
08/26/2020	IDS	RP	Review accountant retention application.	0.80	675.00	\$540.00
08/26/2020	IDS	RP	Draft objection to accountant retention application.	0.80	675.00	\$540.00
				<u>2.00</u>		<u>\$1,350.00</u>

**Ret. of Prof./Other**

08/31/2020	IDS	RPO	Finalize objection to accountant.	0.50	675.00	\$337.50
				<u>0.50</u>		<u>\$337.50</u>

**TOTAL SERVICES FOR THIS MATTER:**

**\$71,419.50**

---

**Expenses**

08/05/2020	CC	Conference Call [E105] Loop Up, Inv. 284898, JIS	50.07
08/05/2020	LN	05066.00002 Lexis Charges for 08-05-20	22.56
08/06/2020	RE2	SCAN/COPY ( 28 @0.10 PER PG)	2.80
08/07/2020	PO	Postage [E108] Postage	2.20
08/07/2020	RE2	SCAN/COPY ( 72 @0.10 PER PG)	7.20
08/12/2020	CC	Conference Call [E105] Loop Up, Inv. 284898, JIS	0.08
08/12/2020	CC	Conference Call [E105] Loop Up, Inv. 284898, JIS	126.47
08/24/2020	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
08/24/2020	RE2	SCAN/COPY ( 17 @0.10 PER PG)	1.70
08/24/2020	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
08/24/2020	RE2	SCAN/COPY ( 25 @0.10 PER PG)	2.50
08/24/2020	RE2	SCAN/COPY ( 23 @0.10 PER PG)	2.30
08/24/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
08/24/2020	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40
08/24/2020	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
08/24/2020	RE2	SCAN/COPY ( 121 @0.10 PER PG)	12.10
08/24/2020	RE2	SCAN/COPY ( 32 @0.10 PER PG)	3.20

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 11  
Invoice 126765  
August 31, 2020

---

08/25/2020	FE	05066.00002 FedEx Charges for 08-25-20	17.61
08/25/2020	LN	05066.00002 Lexis Charges for 08-25-20	12.46
08/25/2020	RE2	SCAN/COPY ( 7 @0.10 PER PG)	0.70
08/25/2020	RE2	SCAN/COPY ( 286 @0.10 PER PG)	28.60
08/25/2020	RE2	SCAN/COPY ( 10 @0.10 PER PG)	1.00
08/27/2020	LN	05066.00002 Lexis Charges for 08-27-20	14.43
08/28/2020	LN	05066.00002 Lexis Charges for 08-28-20	15.04
08/31/2020	PAC	Pacer - Court Research	47.40
08/31/2020	RS	Research [E106] Everlaw, Inv. 30001	500.00
<b>Total Expenses for this Matter</b>			<b>\$876.72</b>



---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 08/31/2020**

**Total Fees \$71,419.50**

**Total Expenses 876.72**

**Total Due on Current Invoice \$72,296.22**

**Outstanding Balance from prior invoices as of 08/31/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 13  
Invoice 126765  
August 31, 2020

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
<b>Total Amount Due on Current and Prior Invoices:</b>				<b>\$418,471.86</b>

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

September 30, 2020

Invoice 126833

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 09/30/2020**

FEES \$7,512.50

EXPENSES \$567.41

**TOTAL CURRENT CHARGES** **\$8,079.91**

**BALANCE FORWARD** **\$418,471.86**

**TOTAL BALANCE DUE** **\$426,551.77**

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	0.60	\$405.00
IDS	Scharf, Ilan D.	Partner	675.00	3.50	\$2,362.50
JIS	Stang, James I.	Partner	675.00	3.20	\$2,160.00
KHB	Brown, Kenneth H.	Partner	675.00	3.60	\$2,430.00
WLR	Ramseyer, William L.	Counsel	775.00	0.20	\$155.00
				11.10	\$7,512.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.70	\$472.50
AD	Asset Disposition [B130]	2.10	\$1,417.50
BL	Bankruptcy Litigation [L430]	4.20	\$2,835.00
CO	Claims Admin/Objections[B310]	0.70	\$472.50
CP	Compensation Prof. [B160]	0.20	\$155.00
GC	General Creditors Comm. [B150]	0.80	\$540.00
IC	Insurance Coverage	2.20	\$1,485.00
RP	Retention of Prof. [B160]	0.20	\$135.00
		11.10	<hr/> \$7,512.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 126833  
September 30, 2020

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$37.61
Pacer - Court Research	\$29.80
Research [E106]	\$500.00
	<hr/>
	\$567.41

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
09/08/2020	JIS	AA	Call Ilan Scharf re ADSF property for St. John Baptist (Santa Fe)(.2) and review/send email re same.	0.40	675.00	\$270.00
09/09/2020	GSG	AA	Review spreadsheet and emails re property reconciliation.	0.30	675.00	\$202.50
				<b>0.70</b>		<b>\$472.50</b>
<b>Asset Disposition [B130]</b>						
09/08/2020	IDS	AD	Attend to potential sale issue.	0.40	675.00	\$270.00
09/11/2020	JIS	AD	Call with State Court Counsel to update on status of real property sales.	0.10	675.00	\$67.50
09/15/2020	JIS	AD	Respond to Faddoul email regarding properties and respond to call from Otero inquiry.	0.10	675.00	\$67.50
09/18/2020	JIS	AD	Call with F. Elsaesser regarding real property status.	0.20	675.00	\$135.00
09/18/2020	JIS	AD	Call with Ilan Scharf regarding real property status (2x).	0.40	675.00	\$270.00
09/18/2020	JIS	AD	Call with State Court Counsel regarding real property status.	0.40	675.00	\$270.00
09/18/2020	JIS	AD	Call with Debtor's counsel and Ilan Scharf regarding Carmelite property and other property status.	0.50	675.00	\$337.50
				<b>2.10</b>		<b>\$1,417.50</b>
<b>Bankruptcy Litigation [L430]</b>						
09/15/2020	JIS	BL	Review Carmelite Nun motion and email to Committee regarding real estate status, email to FE re Nuns' motion.	0.30	675.00	\$202.50
09/18/2020	KHB	BL	Review Carmelite motion to abandon (.2); confer with J. Stang re fraudulent transfer issues (.2).	0.40	675.00	\$270.00
09/23/2020	KHB	BL	Review and revise complaints.	3.20	675.00	\$2,160.00
09/25/2020	GSG	BL	Review K. Brown revisions re DLF Complaint and finalize same.	0.30	675.00	\$202.50
				<b>4.20</b>		<b>\$2,835.00</b>
<b>Claims Admin/Objections[B310]</b>						
09/01/2020	IDS	CO	Email to Walker, Monagle regarding new claim filed.	0.20	675.00	\$135.00
09/02/2020	IDS	CO	Review new claim; email to Monsye regarding	0.50	675.00	\$337.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
same.				<u>0.70</u>		<u>\$472.50</u>
<b>Compensation Prof. [B160]</b>						
09/02/2020	WLR	CP	Telephone call from and telephone call to James Stang re fee application (.1) and send correspondence to James Stang and Liliana Gardiazabal re July bill	0.20	775.00	\$155.00
				<u>0.20</u>		<u>\$155.00</u>
<b>General Creditors Comm. [B150]</b>						
09/02/2020	JIS	GC	Call B. Hall regarding case status including action items pending ruling on standing motion.	0.30	675.00	\$202.50
09/04/2020	JIS	GC	Call with Survivor re case status.	0.30	675.00	\$202.50
09/25/2020	JIS	GC	Call with state court counsel regarding property status, standing motion, motion for abandonment.	0.10	675.00	\$67.50
09/30/2020	JIS	GC	Call with B. Hall regarding chapter 7 trustee cases for claimants.	0.10	675.00	\$67.50
				<u>0.80</u>		<u>\$540.00</u>
<b>Insurance Coverage</b>						
09/24/2020	IDS	IC	Continue insurance / claims analysis.	2.20	675.00	\$1,485.00
				<u>2.20</u>		<u>\$1,485.00</u>
<b>Retention of Prof. [B160]</b>						
09/24/2020	IDS	RP	Email to James Stang regarding annual auditor retention.	0.20	675.00	\$135.00
				<u>0.20</u>		<u>\$135.00</u>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$7,512.50</b>



**Expenses**

09/02/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	37.54
09/04/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.07
09/30/2020	PAC	Pacer - Court Research	29.80
09/30/2020	RS	Research [E106] Everlaw, Inc. Inv. 31039	500.00
<b>Total Expenses for this Matter</b>			<b>\$567.41</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 09/30/2020**

**Total Fees \$7,512.50**

**Total Expenses 567.41**

**Total Due on Current Invoice \$8,079.91**

**Outstanding Balance from prior invoices as of 09/30/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 9  
Invoice 126833  
September 30, 2020

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$72,296.22
<b>Total Amount Due on Current and Prior Invoices:</b>				<b>\$426,551.77</b>

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

October 31, 2020

Invoice 126904

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 10/31/2020**

FEES	\$89,325.00
EXPENSES	\$2,234.47
<b>TOTAL CURRENT CHARGES</b>	<b>\$91,559.47</b>
<b>BALANCE FORWARD</b>	<b>\$426,551.77</b>
<b>TOTAL BALANCE DUE</b>	<b>\$518,111.24</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
EG	Gray, Erin	Counsel	675.00	4.10	\$2,767.50
GIG	Glazer, Gabriel I.	Partner	675.00	13.40	\$9,045.00
GSG	Greenwood, Gail S.	Counsel	675.00	45.90	\$30,982.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	0.80	\$540.00
IDS	Scharf, Ilan D.	Partner	675.00	8.30	\$5,602.50
IMP	Pachulski, Isaac M.	Partner	675.00	0.70	\$472.50
JIS	Stang, James I.	Partner	675.00	16.60	\$11,205.00
KHB	Brown, Kenneth H.	Partner	675.00	34.50	\$23,287.50
LAF	Forrester, Leslie A.	Other	450.00	0.80	\$360.00
PJK	Keane, Peter J.	Counsel	675.00	7.50	\$5,062.50
				<hr/> 132.60	<hr/> \$89,325.00

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AP	Appeals [B430]	23.40	\$15,682.50
BL	Bankruptcy Litigation [L430]	95.10	\$64,125.00
GC	General Creditors Comm. [B150]	13.10	\$8,842.50
ME	Mediation	0.20	\$135.00
PD	Plan & Disclosure Stmt. [B320]	0.80	\$540.00
		132.60	<hr/> \$89,325.00

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Bloomberg	\$366.80
Conference Call [E105]	\$180.97
Federal Express [E108]	\$32.80
Filing Fee [E112]	\$1,050.00
Postage [E108]	\$47.50
Reproduction/ Scan Copy	\$56.40
Research [E106]	\$500.00
	<hr/>
	\$2,234.47

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Appeals [B430]</b>						
10/26/2020	LAF	AP	Legal research re: Stay pending appeal.	0.50	450.00	\$225.00
10/26/2020	GSG	AP	Review stay relief authorities, and research additional case law re same.	3.20	675.00	\$2,160.00
10/28/2020	JIS	AP	Call with Ken Brown regarding issues related to stay pending appeal.	0.50	675.00	\$337.50
10/28/2020	GSG	AP	Emails re stipulation and procedural status.	0.10	675.00	\$67.50
10/28/2020	GSG	AP	Research re appellate standards and leave to appeal derivative standing.	2.50	675.00	\$1,687.50
10/29/2020	GSG	AP	Research re appellate jurisdiction standards applicable to interlocutory and final orders in the 10th Cir.	3.20	675.00	\$2,160.00
10/29/2020	GSG	AP	Confer with K. Brown re motion for stay relief, opposition and status.	0.20	675.00	\$135.00
10/29/2020	GSG	AP	Research/review USBC NM opinions re review on appeal.	1.40	675.00	\$945.00
10/29/2020	GSG	AP	Draft opposition to stay motion re likelihood of success on appeal.	3.40	675.00	\$2,295.00
10/30/2020	GSG	AP	Draft opposition to stay motion re likelihood of success on appeal and 10th Circuit standards.	7.40	675.00	\$4,995.00
10/30/2020	GSG	AP	Collect and circulate case law re applicable standards of review; email K. Brown re same.	1.00	675.00	\$675.00
				<b>23.40</b>		<b>\$15,682.50</b>

**Bankruptcy Litigation [L430]**

10/09/2020	IAWN	BL	Review opinion from Thuma	0.80	675.00	\$540.00
10/09/2020	KHB	BL	Review opinion and order granting motion for standing (1.0); telephone call with J. Stang re same (.2); consider next steps and email to J. Stang and G. Greenwood re same (.3).	1.50	675.00	\$1,012.50
10/13/2020	JIS	BL	Call Ken Brown regarding complaints following Thuma ruling.	0.20	675.00	\$135.00
10/13/2020	KHB	BL	Confer with J. Stang re filing complaints to avoid fraudulent transfers and additional data required from debtor (.2); confer with G. Greenwood re finalizing and filing complaints (.4); emails to counsel for Debtors, Trusts and Parishes re accepting service of complaint and compliance with court order for additional data on DLF (.6).	1.20	675.00	\$810.00



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/13/2020	GSG	BL	Confer with K. Brown re complaints.	0.10	675.00	\$67.50
10/14/2020	KHB	BL	Call with Committee re impact of order granting standing and next steps.	0.70	675.00	\$472.50
10/14/2020	GSG	BL	Review opinion and details re standing.	0.70	675.00	\$472.50
10/14/2020	GSG	BL	Draft/revise complaints re RE Trust and unrecorded interests.	2.20	675.00	\$1,485.00
10/14/2020	GSG	BL	Review state court complaint and issues re reachback period.	0.80	675.00	\$540.00
10/14/2020	GSG	BL	Emails to/from K. Brown re revisions to complaints.	0.30	675.00	\$202.50
10/14/2020	GSG	BL	Review LBR and forms re adversary proceedings; confer with M. Renck re summons and coversheet (.4); review and revise same (.8).	1.20	675.00	\$810.00
10/15/2020	JIS	BL	Call Ken Brown regarding strategies for avoidance action litigation.	0.60	675.00	\$405.00
10/15/2020	KHB	BL	Confer with J. Stang and G. Greenwood re revocation of trusts and finalizing complaints in light of order granting standing.	0.30	675.00	\$202.50
10/15/2020	GSG	BL	Review LBR and email K. Brown re pro hac applications.	0.50	675.00	\$337.50
10/15/2020	GSG	BL	Confer with H. Phan re docket and pro hac status; review/revise and circulate pro hac applications and orders.	1.10	675.00	\$742.50
10/16/2020	KHB	BL	Work on finalizing and filing complaints and emails with Gail Greenwood re same.	0.50	675.00	\$337.50
10/16/2020	KHB	BL	Conf. call with SCC re litigation strategy and next steps in light order granting standing to file complaints (1.5); prepare for call (.3).	1.80	675.00	\$1,215.00
10/19/2020	KHB	BL	Emails with Debtor's counsel re DLF balances and compliance with court order(.3); emails with G. Greenwood re finalizing DLF complaint (.1); email to Debtor's counsel re revocation of trusts and review documents and authorities re same (1.0); review pleadings filed (.3).	1.70	675.00	\$1,147.50
10/19/2020	GSG	BL	Review secretary of state information are parish defendants and DLF Trust complaint; notes re same.	0.60	675.00	\$405.00
10/19/2020	GSG	BL	Revise DLF Trust complaint re parish defendants (.6); review indenture of trust and confer with M. Renck re coversheet and summons (.3).	0.90	675.00	\$607.50
10/20/2020	KHB	BL	Email to Debtor's counsel re revocation of trusts and compliance with court order.	0.30	675.00	\$202.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/20/2020	GSG	BL	Review/revise coversheet, summons, and complaint.	0.40	675.00	\$270.00
10/21/2020	KHB	BL	Confer with J. Stang re next steps in Committee litigation (.2); emails to G. Greenwood re service of complaints (.2).	0.40	675.00	\$270.00
10/21/2020	GSG	BL	Review and circulate summons; calendar deadlines.	0.30	675.00	\$202.50
10/22/2020	JIS	BL	Draft email to Gail Greenwood and Isaac Pachulski regarding trustee research.	0.40	675.00	\$270.00
10/22/2020	JIS	BL	Review and draft email regarding DIP v. trustee v. examiner for sale of properties.	0.20	675.00	\$135.00
10/22/2020	KHB	BL	Emails and voice message to debtor's counsel re service of complaints and DLF balances (.3); email with G. Greenwood re filing DLF complaint and service issues (.2).	0.50	675.00	\$337.50
10/22/2020	GSG	BL	Review DLF Complaint re filing and service (.2); emails to/from counsel re service of summons and complaints (.5); confer with M. Renck re completion of service.	0.90	675.00	\$607.50
10/22/2020	GSG	BL	Research/review cases re appealability of standing order.	0.90	675.00	\$607.50
10/22/2020	GSG	BL	Review email re strategy and committee follow-up (.2); review and revise notes re discovery requests (.3).	0.50	675.00	\$337.50
10/22/2020	GIG	BL	Multiple emails with J. Stang, Isaac M. Pachulski re examiner powers	0.50	675.00	\$337.50
10/22/2020	GIG	BL	Research re examiner powers	0.70	675.00	\$472.50
10/23/2020	JIS	BL	Call with Ken Brown re Debtor's Rule 9023 motion and stay pending appeal.	0.20	675.00	\$135.00
10/23/2020	JIS	BL	Research regarding first amendment and execution liens.	1.50	675.00	\$1,012.50
10/23/2020	KHB	BL	Work on discovery and review local rules re same (1.3); review motions for reconsideration of order granting standing and motion for stay pending appeal; review authorities and consider responses to same (1.8); confer with J. Stang re same (.2); confer with G. Greenwood re same (.2); emails with Debtor's counsel re same (.2).	3.70	675.00	\$2,497.50
10/23/2020	IDS	BL	Brief review of Archdiocese of Santa Fe 9023 and stay actions.	0.50	675.00	\$337.50
10/23/2020	IDS	BL	Telephone call with James Stang regarding fiduciary for property analysis.	0.30	675.00	\$202.50
10/23/2020	GSG	BL	Review motion for reconsideration and motion for	3.40	675.00	\$2,295.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			stay pending appeal (.5); research cases re FRCP 59(e) standards and waiver (2.9)			
10/25/2020	GSG	BL	Draft memo/email re reconsideration standards and waiver based on absence of prior argument.	3.30	675.00	\$2,227.50
10/26/2020	JIS	BL	Call with Ken Brown regarding RFRA and First Amendment issues related to property administration.	0.50	675.00	\$337.50
10/26/2020	KHB	BL	Review authorities and work on opposition to motion for stay pending appeal (3.0); telephone call with J. Stang and Ford Elsaesser re proposed stipulation to amend order granting standing to committee (.5); confer with J. Stang re Debtor's claims to mission critical property (.5).	4.00	675.00	\$2,700.00
10/26/2020	IDS	BL	Review Kenneth Brown email regarding avoidance actions.	0.80	675.00	\$540.00
10/27/2020	KHB	BL	Confer with Ford Elsaesser re stipulation for amended order granting standing and hearing date on motion for stay pending appeal (.2); review and revise proposed amended order granting standing and emails to F. Elsaesser re same (.4); review local rules re response deadline for opposition to motions and emails to F. Elsaesser re briefing schedule (.2); review notice of preliminary hearing (.1); work on opposition to motion for stay pending appeal and analyze authority re same (3.6).	4.50	675.00	\$3,037.50
10/27/2020	IDS	BL	Research regarding retention of examiner with expanding power.	1.40	675.00	\$945.00
10/27/2020	GSG	BL	Research/review cases re appellate review of derivative standing; email re same.	4.70	675.00	\$3,172.50
10/28/2020	JIS	BL	Call with Gabriel Glazer regarding research for role regarding property administration.	0.50	675.00	\$337.50
10/28/2020	JIS	BL	Call Ken Brown regarding issues related to property administration.	0.50	675.00	\$337.50
10/28/2020	KHB	BL	Telephone call with J. Stang re opposition to motion for stay pending appeal (.2); review proposed stipulated order modifying order granting standing (.2); emails with debtor's counsel re same and re briefing schedule (.2); emails with J. Stang re same (.2)	0.80	675.00	\$540.00
10/28/2020	IDS	BL	Email with KC Maniere regarding examiner with expanded powers.	0.20	675.00	\$135.00
10/28/2020	PJK	BL	Emails with G Glazer re research project re examiners (.2), begin research re same (.4)	0.60	675.00	\$405.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/28/2020	GIG	BL	Call with James I. Stang re examiner relief	0.50	675.00	\$337.50
10/28/2020	GIG	BL	Prepare email to P. Keane re research issues	0.50	675.00	\$337.50
10/28/2020	GIG	BL	Call with Isaac M. Pachulski re trustee authority	0.30	675.00	\$202.50
10/28/2020	IMP	BL	Exchange e-mails with Gabriel I. Glazer; Analyze issues re potential strategy; Telephone conference with Gabriel I. Glazer re same.	0.30	675.00	\$202.50
10/29/2020	EG	BL	research re: section 1107(a) and the appointment of a trustee with limited powers and draft summary re: same	4.10	675.00	\$2,767.50
10/29/2020	JIS	BL	Review memo on issues related to RFRA and mission critical disputes.	0.90	675.00	\$607.50
10/29/2020	KHB	BL	Confer with G. Greenwood re filing DLF complaint (.2); confer with Tom Walker re stipulated order to amend standing order and preliminary hearing (.2); email J. Stang and G. Greenwood re same (.1); review revisions to stipulated order granting standing and email to Tom Walker re same (.2); work on opposition to motion for stay pending appeal (5.6).	6.30	675.00	\$4,252.50
10/29/2020	GSG	BL	Review, finalize, and file DLF Complaint and confer re summons, coversheet, and service.	0.70	675.00	\$472.50
10/29/2020	PJK	BL	Research re examiner issues and review/analyze cases re same (4.4), prepare summary and email to G Glazier (.8)	5.20	675.00	\$3,510.00
10/29/2020	GIG	BL	Emails with E. Gray re section 1107 research, review same	0.60	675.00	\$405.00
10/29/2020	GIG	BL	Research re trustee/examiner appointment and duties	1.70	675.00	\$1,147.50
10/29/2020	IMP	BL	Review e-mail re research re potential strategy.	0.20	675.00	\$135.00
10/29/2020	IMP	BL	Review additional research re potential strategy.	0.20	675.00	\$135.00
10/30/2020	KHB	BL	Review amended order granting standing and emails with Debtor's counsel re same (.2); work on opposition to motion for stay pending appeal and analyze authorities re same (5.5).	5.70	675.00	\$3,847.50
10/30/2020	LAF	BL	Obtain case for KHB.	0.30	450.00	\$135.00
10/30/2020	IDS	BL	Research regarding examiner with expanded powers, review CBJ file regarding same.	1.80	675.00	\$1,215.00
10/30/2020	IDS	BL	Telephone call with F. Glazer regarding examiner with expanded powers.	0.30	675.00	\$202.50
10/30/2020	IDS	BL	Attend SCC call regarding mediation, asset sales.	0.80	675.00	\$540.00
10/30/2020	PJK	BL	Further research re examiner issues per G Glazer	1.50	675.00	\$1,012.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			follow up questions			
10/30/2020	PJK	BL	Emails with G Glazer re examiner issues and further research points	0.20	675.00	\$135.00
10/30/2020	GIG	BL	Emails with P. Keane re section 1106 research	0.30	675.00	\$202.50
10/30/2020	GIG	BL	Research re examiner authority	3.70	675.00	\$2,497.50
10/30/2020	GIG	BL	Call with I. Scharf re trustee motion	0.30	675.00	\$202.50
10/30/2020	GIG	BL	Research re trustee appointment standards	2.20	675.00	\$1,485.00
10/30/2020	GIG	BL	Review motion to appoint examiner with expanded powers, emails with I. Scharf re same	0.60	675.00	\$405.00
10/30/2020	GIG	BL	Multiple emails with L. Forrester re examiner research	0.20	675.00	\$135.00
10/30/2020	GIG	BL	Emails with E. Gray re section 1107 research	0.10	675.00	\$67.50
10/31/2020	GIG	BL	Emails with P. Keane re examiner research	0.10	675.00	\$67.50
10/31/2020	GIG	BL	Email E. Gray re trustee research	0.10	675.00	\$67.50
10/31/2020	GIG	BL	Research re examiner with expanded powers	0.30	675.00	\$202.50
				<b>95.10</b>		<b>\$64,125.00</b>

**General Creditors Comm. [B150]**

10/02/2020	JIS	GC	Call with survivor regarding case status.	0.40	675.00	\$270.00
10/02/2020	IDS	GC	SCC meeting regarding mediation, asset sales.	0.80	675.00	\$540.00
10/09/2020	JIS	GC	Call with state court counsel regarding real property and case status.	0.10	675.00	\$67.50
10/12/2020	JIS	GC	Call with survivor regarding case status.	0.20	675.00	\$135.00
10/14/2020	JIS	GC	Call Brad Hall regarding Thuma opinion and committee agenda for call.	0.30	675.00	\$202.50
10/14/2020	JIS	GC	Review Thuma opinion and order in prep for Committee meeting.	1.00	675.00	\$675.00
10/14/2020	JIS	GC	Attend Committee call regarding Thuma opinion and next steps.	0.80	675.00	\$540.00
10/15/2020	JIS	GC	Call with Ford Elsaesser regarding ruling on standing motion and asset sales.	0.60	675.00	\$405.00
10/16/2020	JIS	GC	Call with all state court counsel regarding next steps after Judge Thuma ruling.	1.50	675.00	\$1,012.50
10/21/2020	JIS	GC	Draft memo to Committee on next steps in case.	0.70	675.00	\$472.50
10/21/2020	JIS	GC	Committee call regarding next steps after avoidance actions.	1.10	675.00	\$742.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/22/2020	JIS	GC	Call with BH and LM regarding individual chapter 7 cases of survivors, property sale inquiries.	0.20	675.00	\$135.00
10/22/2020	KHB	GC	Email from J. Stang to committee re next steps in litigation/mediation.	0.20	675.00	\$135.00
10/23/2020	JIS	GC	Call with state court counsel re next steps.	1.50	675.00	\$1,012.50
10/23/2020	IDS	GC	Telephone call with SCC regarding mediation, avoidance actions.	1.40	675.00	\$945.00
10/26/2020	JIS	GC	Call with F. Elsaesser re appellate issues and property status.	0.50	675.00	\$337.50
10/29/2020	JIS	GC	Calls with C. Vernon and BSmith re case status.	0.40	675.00	\$270.00
10/29/2020	GIG	GC	Emails with P. Keane re section 1007 research , review same	0.70	675.00	\$472.50
10/30/2020	JIS	GC	Call with state court counsel regarding next steps and real property analysis.	0.70	675.00	\$472.50
				<u>13.10</u>		<u>\$8,842.50</u>

#### **Mediation**

10/21/2020	JIS	ME	Call with A. Malott regarding status of mediation.	0.20	675.00	\$135.00
				<u>0.20</u>		<u>\$135.00</u>

#### **Plan & Disclosure Stmt. [B320]**

10/29/2020	JIS	PD	Call Ken Brown regarding best interests test and RFRA.	0.40	675.00	\$270.00
10/29/2020	KHB	PD	Confer with J. Stang re best interests test and RFRA.	0.40	675.00	\$270.00
				<u>0.80</u>		<u>\$540.00</u>

#### **TOTAL SERVICES FOR THIS MATTER:**

**\$89,325.00**

---

**Expenses**

10/06/2020	PO	Postage [E108] Postage	22.75
10/12/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	18.67
10/14/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	64.15
10/16/2020	FF	Filing Fee [E112] United States Bankruptcy Court, H. Phan	350.00
10/16/2020	FF	Filing Fee [E112] United States Bankruptcy Court, H. Phan	350.00
10/19/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	20.81
10/19/2020	RE2	SCAN/COPY ( 28 @0.10 PER PG)	2.80
10/19/2020	RE2	SCAN/COPY ( 41 @0.10 PER PG)	4.10
10/19/2020	RE2	SCAN/COPY ( 54 @0.10 PER PG)	5.40
10/21/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.15
10/21/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	73.61
10/22/2020	FE	05066.00002 FedEx Charges for 10-22-20	16.40
10/22/2020	RE2	SCAN/COPY ( 60 @0.10 PER PG)	6.00
10/22/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
10/22/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
10/22/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
10/22/2020	RE2	SCAN/COPY ( 20 @0.10 PER PG)	2.00

---

10/22/2020	RE2	SCAN/COPY ( 28 @0.10 PER PG)	2.80
10/22/2020	RE2	SCAN/COPY ( 54 @0.10 PER PG)	5.40
10/22/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
10/22/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
10/22/2020	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
10/22/2020	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
10/22/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
10/23/2020	FE	05066.00002 FedEx Charges for 10-23-20	16.40
10/23/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
10/23/2020	RE2	SCAN/COPY ( 26 @0.10 PER PG)	2.60
10/23/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
10/23/2020	RE2	SCAN/COPY ( 26 @0.10 PER PG)	2.60
10/23/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
10/23/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
10/23/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
10/23/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
10/23/2020	RE2	SCAN/COPY ( 52 @0.10 PER PG)	5.20
10/23/2020	RE2	SCAN/COPY ( 52 @0.10 PER PG)	5.20



---

10/23/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
10/23/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
10/24/2020	PO	Postage [E108] Postage	24.75
10/26/2020	CC	Conference Call [E105] AT&T Conference Call, KHB	3.58
10/26/2020	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
10/29/2020	FF	Filing Fee [E112] United States Bankruptcy Court, H. Phan	350.00
10/29/2020	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
10/29/2020	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60
10/29/2020	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
10/29/2020	RE2	SCAN/COPY ( 18 @0.10 PER PG)	1.80
10/30/2020	BB	05066.00002 Bloomberg Charges for 11-03-20	366.80
10/31/2020	RS	Research [E106] Everlaw, Inv. 31923	500.00
<b>Total Expenses for this Matter</b>			<b>\$2,234.47</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 10/31/2020**

**Total Fees \$89,325.00**

**Total Expenses 2,234.47**

**Total Due on Current Invoice \$91,559.47**

**Outstanding Balance from prior invoices as of 10/31/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 16  
Invoice 126904  
October 31, 2020

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$72,296.22
126833	09/30/2020	\$7,512.50	\$567.41	\$8,079.91
<b>Total Amount Due on Current and Prior Invoices:</b>				<b>\$518,111.24</b>

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

November 30, 2020

JIS

Invoice 126905

Client 05066

Matter 00002

**JIS**

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/30/2020**

FEES \$86,197.50

EXPENSES \$641.07

**TOTAL CURRENT CHARGES** **\$86,838.57**

**BALANCE FORWARD** **\$518,111.24**

**TOTAL BALANCE DUE** **\$604,949.81**

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
EG	Gray, Erin	Counsel	675.00	5.90	\$3,982.50
GIG	Glazer, Gabriel I.	Partner	675.00	9.10	\$6,142.50
GSG	Greenwood, Gail S.	Counsel	675.00	51.10	\$34,492.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	4.20	\$2,835.00
IDS	Scharf, Ilan D.	Partner	675.00	8.20	\$5,535.00
IMP	Pachulski, Isaac M.	Partner	675.00	0.40	\$270.00
JIS	Stang, James I.	Partner	675.00	8.50	\$5,737.50
KHB	Brown, Kenneth H.	Partner	675.00	36.10	\$24,367.50
PJK	Keane, Peter J.	Counsel	675.00	4.20	\$2,835.00
				<hr/> 127.70	<hr/> \$86,197.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	2.40	\$1,620.00
AD	Asset Disposition [B130]	1.80	\$1,215.00
AP	Appeals [B430]	84.70	\$57,172.50
BL	Bankruptcy Litigation [L430]	22.10	\$14,917.50
GC	General Creditors Comm. [B150]	4.90	\$3,307.50
HE	Hearing	1.60	\$1,080.00
IC	Insurance Coverage	2.40	\$1,620.00
ME	Mediation	7.80	\$5,265.00
		127.70	<hr/> \$86,197.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 126905  
November 30, 2020

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$90.77
Federal Express [E108]	\$32.80
Reproduction/ Scan Copy	\$17.50
Research [E106]	\$500.00
	<hr/>
	\$641.07

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
11/06/2020	IDS	AA	Call with F. Elssaeser regarding property.	0.60	675.00	\$405.00
11/06/2020	IDS	AA	Review ADSF property analysis.	1.80	675.00	\$1,215.00
				<b>2.40</b>		<b>\$1,620.00</b>
<b>Asset Disposition [B130]</b>						
11/02/2020	IDS	AD	Review email from T. Walker regarding AB residence sale.	0.40	675.00	\$270.00
11/05/2020	JIS	AD	Call from Otero broker re offers.	0.10	675.00	\$67.50
11/06/2020	IDS	AD	Review property purchase update from Debtor.	0.40	675.00	\$270.00
11/11/2020	JIS	AD	Review issues related to sales of parish, including call to Ilan Scharf and Brad Hall.	0.80	675.00	\$540.00
11/12/2020	GSG	AD	Review property disposition.	0.10	675.00	\$67.50
				<b>1.80</b>		<b>\$1,215.00</b>
<b>Appeals [B430]</b>						
11/02/2020	GSG	AP	Revise argument re likelihood of success on appeal; email K. Brown re same.	0.40	675.00	\$270.00
11/03/2020	KHB	AP	Emails T. Wakler re stipulation on extensions and scheduling (.2); review stipulation (.2).	0.40	675.00	\$270.00
11/04/2020	KHB	AP	Work on opposition to motion for stay pending appeal (1.3); email to Debtor's counsel re scheduling stipulation (.1).	1.40	675.00	\$945.00
11/05/2020	KHB	AP	Work on opposition to motion for stay pending appeal (1.3); confer with G. Greenwood re same (.1).	1.40	675.00	\$945.00
11/05/2020	GSG	AP	Review stipulations and calendar; confer with KHB re further briefing.	0.20	675.00	\$135.00
11/06/2020	KHB	AP	Confer with Ford Elsassner re motion to stay pending appeal (.2); work on opposition to motion for stay pending appeal (5.2).	5.40	675.00	\$3,645.00
11/06/2020	GSG	AP	Review FRBP re appellate timing; review and calendar deadlines re appeal and briefing and AVPs (.4); emails re AVPs and deadlines (.1).	0.50	675.00	\$337.50
11/08/2020	KHB	AP	Work on opposition to motion for stay pending appeal.	1.60	675.00	\$1,080.00
11/09/2020	KHB	AP	Work on opposition to motion for stay pending appeal (2.8); attend preliminary hearing (.3).	3.10	675.00	\$2,092.50



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/09/2020	GSG	AP	Attend telephonic hearing re preliminary hearing re motion for stay pending appeal; calendar applicable deadlines.	0.40	675.00	\$270.00
11/10/2020	GSG	AP	Review emails and docket re scheduling conferences; telephone call to court clerk re returned mail docket entries.	0.30	675.00	\$202.50
11/11/2020	GSG	AP	Review dockets and confer with M. Renck re Notices of Entry of scheduling order (.4); review and finalize notices for filing and service (.4).	0.80	675.00	\$540.00
11/12/2020	GSG	AP	Review opposition to motion for stay pending appeal; research re additional authority; revise opposition re same.	5.30	675.00	\$3,577.50
11/13/2020	KHB	AP	Emails with G. Greenwood re opposition to motion for stay pending appeal.	0.20	675.00	\$135.00
11/13/2020	GSG	AP	Review additional case law cited by ADSF; revise opposition re stay pending appeal.	6.90	675.00	\$4,657.50
11/16/2020	GSG	AP	Research/draft opposition to relief from stay motion; revise and blackline same and circulate to K. Brown.	6.80	675.00	\$4,590.00
11/17/2020	KHB	AP	Work on opposition to motion for stay pending appeal and analyze authorities re religious freedom issues.	1.80	675.00	\$1,215.00
11/17/2020	GSG	AP	Review related stay oppositions and authority.	1.80	675.00	\$1,215.00
11/17/2020	GSG	AP	Review and revise stay opposition re comments and additional authorities; revise format of arguments.	7.70	675.00	\$5,197.50
11/18/2020	KHB	AP	Review notices of appeal (.2); emails with G. Greenwood re calendaring appropriate dates for appeals (.2).	0.40	675.00	\$270.00
11/18/2020	KHB	AP	Work on opposition to motion for stay pending appeal.	2.00	675.00	\$1,350.00
11/18/2020	GSG	AP	Review and circulate blackline of stay opposition.	0.80	675.00	\$540.00
11/18/2020	GSG	AP	Review notice of appeal and calendar.	0.20	675.00	\$135.00
11/19/2020	KHB	AP	Work on opposition to motion for stay pending appeal.	3.30	675.00	\$2,227.50
11/19/2020	KHB	AP	Review order to show cause why appeal should not be dismissed, authorities re same and prepare response (3.1); confer with G.Greenwood re same (.3); review statement from BAP re required filings and review appellate rules re same (.3); emails with G. Greenwood re filing required statement with BAP; consider basis of motion to dismiss appeal (.2)	3.90	675.00	\$2,632.50
11/19/2020	GSG	AP	Additional research re appealable final orders and	2.20	675.00	\$1,485.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			standing.			
11/19/2020	GSG	AP	Draft/revise opposition to stay pending appeal.	4.40	675.00	\$2,970.00
11/19/2020	GSG	AP	Review OSC re interlocutory order and BAP LBR re statements, pro hac admissions, and briefing.	0.40	675.00	\$270.00
11/19/2020	GSG	AP	Draft statement of admission etc re BAP LBR.	1.60	675.00	\$1,080.00
11/20/2020	KHB	AP	Review notices of appeal and order of joinder (.4); review authorities re standing to appeal (1.8); confer with J. Stang and G. Greenwood re same (.3).	2.50	675.00	\$1,687.50
11/20/2020	KHB	AP	Work on opposition to motion for stay pending appeal (4.8); confer with J. Stang re settlement discussions with Debtor (.4); confer with G. Greenwood re opposition (.2).	5.40	675.00	\$3,645.00
11/20/2020	KHB	AP	Work on opposition to motion for stay pending appeal.	0.30	675.00	\$202.50
11/20/2020	GSG	AP	Review ADSF notices of appeal and additional court notices; calendar same.	0.50	675.00	\$337.50
11/20/2020	GSG	AP	Review/revise opposition to motion for stay pending appeal re additional arguments and case law.	1.90	675.00	\$1,282.50
11/20/2020	GSG	AP	Confer with J. Stang / K. Brown re standing and parties to appeal.	0.30	675.00	\$202.50
11/20/2020	GSG	AP	Emails to/from K. Brown re appellate briefing and revisions to stay opposition.	0.10	675.00	\$67.50
11/21/2020	GSG	AP	Revise and cite check opposition to stay.	1.60	675.00	\$1,080.00
11/22/2020	KHB	AP	Work on opposition to motion for stay pending appeal (.4); email with G. Greenfield re same (.1).	0.50	675.00	\$337.50
11/23/2020	KHB	AP	Emails from SCC re comments to opposition to motion for stay pending appeal (.3); emails with G. Greenwood re same (.2); work on opposition brief (.7).	1.20	675.00	\$810.00
11/23/2020	GSG	AP	Review docket and revise stay opposition re ASF as appellant (1.2); confer with K. Brown re same (.2); review comments re certification statement (.1).	1.50	675.00	\$1,012.50
11/24/2020	KHB	AP	Confer with G. Greenwood re opposition to motion for stay pending appeal.	0.20	675.00	\$135.00
11/24/2020	GSG	AP	Review authorities and TOC/TOA and finalize opposition for filing; review COS and exhibit.	1.90	675.00	\$1,282.50
11/25/2020	GSG	AP	Review certification statement by ADSF; confer with K. Brown re same (.2); finalize and file opposition re stay (.1).	0.30	675.00	\$202.50
11/30/2020	KHB	AP	Review ASF statement of admission.	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/30/2020	GSG	AP	Revise BAP statement re parish defendants as interested parties; review BAP LBR re same.	0.70	675.00	\$472.50
				<b>84.70</b>		<b>\$57,172.50</b>

### Bankruptcy Litigation [L430]

11/02/2020	EG	BL	research and draft memo regarding section 1107(a) and the authority of the bankruptcy court to appoint a trustee with limited powers	5.10	675.00	\$3,442.50
11/02/2020	KHB	BL	Call from court re issuance of summons (.1); emails with G. Greenwood re same. (.1).	0.20	675.00	\$135.00
11/02/2020	GSG	BL	Review summons re dates and confer re service; email K. Brown re dates and status.	0.40	675.00	\$270.00
11/02/2020	PJK	BL	Research additional cases re examiner issue and draft memo re same (2.8), emails with G Glazier re same (.2)	3.00	675.00	\$2,025.00
11/02/2020	GIG	BL	Prepare and edit memo re examiner authority	2.30	675.00	\$1,552.50
11/02/2020	GIG	BL	Prepare and edit memo re trustee authority	3.40	675.00	\$2,295.00
11/03/2020	EG	BL	revise memo and additional research re: section 1107(a) and authority of the bankruptcy court to appoint a trustee with limited powers	0.80	675.00	\$540.00
11/03/2020	JIS	BL	Review memo re appointment of trustee/examiner.	0.30	675.00	\$202.50
11/03/2020	GSG	BL	Review emails and stipulation re preliminary hearing.	0.20	675.00	\$135.00
11/03/2020	PJK	BL	Edits to examiner memo, emails with G Glazer re same, additional research re examiner issues	1.20	675.00	\$810.00
11/03/2020	GIG	BL	Prepare and edit memo re examiner and trustee authority	3.30	675.00	\$2,227.50
11/03/2020	GIG	BL	Prepare email to JIS re examiner and trustee memo	0.10	675.00	\$67.50
11/03/2020	IMP	BL	Review email and research memo re potential strategy	0.40	675.00	\$270.00
11/09/2020	GSG	BL	Review opinion re 10 year statute of limitations.	0.20	675.00	\$135.00
11/30/2020	KHB	BL	Review answers to complaints and emails with G. Greenwood re partial SJMs.	0.50	675.00	\$337.50
11/30/2020	GSG	BL	Confer with K. Brown and J. Stang re summary adjudication motion; pull related documents and review RFRA/First Am arguments.	0.70	675.00	\$472.50
				<b>22.10</b>		<b>\$14,917.50</b>

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>General Creditors Comm. [B150]</b>						
11/04/2020	JIS	GC	Attend Committee meeting regarding next steps in mediation.	0.60	675.00	\$405.00
11/06/2020	IDS	GC	Attend SCC call regarding mediation and litigation strategy.	1.00	675.00	\$675.00
11/13/2020	JIS	GC	Committee call and meeting with mediator regarding next steps.	1.80	675.00	\$1,215.00
11/13/2020	JIS	GC	Call with media re property issues.	0.20	675.00	\$135.00
11/16/2020	JIS	GC	Draft email for Wednesday agenda.	0.30	675.00	\$202.50
11/17/2020	JIS	GC	Call with State Court Council regarding case status.	0.20	675.00	\$135.00
11/18/2020	JIS	GC	Call with State Court Council re case status.	0.10	675.00	\$67.50
11/18/2020	JIS	GC	Committee call regarding mediation options and possible settlement offers.	0.50	675.00	\$337.50
11/19/2020	JIS	GC	Call survivor regarding case status.	0.20	675.00	\$135.00
				<b>4.90</b>		<b>\$3,307.50</b>
<b>Hearing</b>						
11/09/2020	IDS	HE	Listen to audio file of hearing.	1.60	675.00	\$1,080.00
				<b>1.60</b>		<b>\$1,080.00</b>
<b>Insurance Coverage</b>						
11/15/2020	IDS	IC	Research regarding plan treatment of unsettled insured claims.	2.40	675.00	\$1,620.00
				<b>2.40</b>		<b>\$1,620.00</b>
<b>Mediation</b>						
11/09/2020	JIS	ME	Call A. Mallott regarding case status and meeting with State Court Counsel.	0.40	675.00	\$270.00
11/09/2020	JIS	ME	Call B. Hall regarding mediation discussions.	0.30	675.00	\$202.50
11/09/2020	JIS	ME	Email to Committee and state court counsel regarding meeting with mediator.	0.10	675.00	\$67.50
11/18/2020	JIS	ME	Call F. Elsaesser regarding settlement and mediation.	0.30	675.00	\$202.50
11/18/2020	JIS	ME	Call State Court Council regarding potential settlement offer from Debtor.	0.50	675.00	\$337.50
11/23/2020	IAWN	ME	Review opposition to leave to appeal motion by debtor (.3), review James I Stang email and	0.70	675.00	\$472.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Elaeasser email regarding timing of offer (.1), review Faduol analysis of options to ADSF offer (.1), review file re status of offer (.1); review Linnenberger analysis of Faduol options (.1)			
11/23/2020	JIS	ME	Review emails regarding next steps in mediation.	0.10	675.00	\$67.50
11/24/2020	JIS	ME	Call State Court Counsel regarding Debtor's mediation offer.	0.10	675.00	\$67.50
11/24/2020	KHB	ME	Email from Debtor's counsel re settlement offer.	0.20	675.00	\$135.00
11/30/2020	IAWN	ME	Prepare for mediation with review of file, settlement agreements etc	2.50	675.00	\$1,687.50
11/30/2020	IAWN	ME	Attend mediation	1.00	675.00	\$675.00
11/30/2020	JIS	ME	Call B. Hall regarding mediation status.	0.10	675.00	\$67.50
11/30/2020	JIS	ME	Call with Mediator and state court counsel re response to AD offer.	1.50	675.00	\$1,012.50
				<u>7.80</u>		<u>\$5,265.00</u>
			<b>TOTAL SERVICES FOR THIS MATTER:</b>			<b>\$86,197.50</b>

---

**Expenses**

11/02/2020	FE	05066.00002 FedEx Charges for 11-02-20	16.40
11/02/2020	FE	05066.00002 FedEx Charges for 11-02-20	16.40
11/02/2020	RE2	SCAN/COPY ( 162 @0.10 PER PG)	16.20
11/02/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
11/02/2020	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
11/02/2020	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
11/04/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	44.42
11/18/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	45.61
11/24/2020	RE2	SCAN/COPY ( 1 @0.10 PER PG)	0.10
11/25/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.74
11/30/2020	RS	Research [E106] Everlaw, Inv.32962	500.00
<b>Total Expenses for this Matter</b>			<b>\$641.07</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 11/30/2020**

**Total Fees \$86,197.50**

**Total Expenses 641.07**

**Total Due on Current Invoice \$86,838.57**

**Outstanding Balance from prior invoices as of 11/30/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 13  
Invoice 126905  
November 30, 2020

---

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$72,296.22
126833	09/30/2020	\$7,512.50	\$567.41	\$8,079.91
126904	10/31/2020	\$89,325.00	\$2,234.47	\$91,559.47

**Total Amount Due on Current and Prior Invoices:**

**\$604,949.81**



# **Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

December 31, 2020

JIS

Invoice 126906

Client 05066

Matter 00002

**JIS**

RE: Committee Representation

---

## **STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/2020**

FEES	\$151,132.50
------	--------------

EXPENSES	\$506.90
----------	----------

<b>TOTAL CURRENT CHARGES</b>	<b>\$151,639.40</b>
------------------------------	---------------------

<b>BALANCE FORWARD</b>	<b>\$604,949.81</b>
------------------------	---------------------

<b>TOTAL BALANCE DUE</b>	<b>\$756,589.21</b>
--------------------------	---------------------

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GNB	Brown, Gillian N.	Counsel	675.00	1.00	\$675.00
GSG	Greenwood, Gail S.	Counsel	675.00	128.30	\$86,602.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	21.10	\$14,242.50
IDS	Scharf, Ilan D.	Partner	675.00	7.40	\$4,995.00
JIS	Stang, James I.	Partner	675.00	19.30	\$13,027.50
KHB	Brown, Kenneth H.	Partner	675.00	46.40	\$31,320.00
LAF	Forrester, Leslie A.	Other	450.00	0.60	\$270.00
				<hr/> 224.10	<hr/> \$151,132.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition [B130]	1.20	\$810.00
AP	Appeals [B430]	127.20	\$85,792.50
BL	Bankruptcy Litigation [L430]	53.30	\$35,910.00
CO	Claims Admin/Objections[B310]	1.00	\$675.00
GC	General Creditors Comm. [B150]	11.10	\$7,492.50
H	Hearings	1.10	\$742.50
IC	Insurance Coverage	19.90	\$13,432.50
ME	Mediation	2.30	\$1,552.50
PD	Plan & Disclosure Stmt. [B320]	7.00	\$4,725.00
		224.10	<hr/> \$151,132.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 126906  
December 31, 2020

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Outside Services	\$500.00
Reproduction/ Scan Copy	\$6.90
	<hr/>
	\$506.90

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Disposition [B130]</b>						
12/04/2020	IDS	AD	Review documents regarding asset sales from F. Elsaesser.	1.20	675.00	\$810.00
				<b>1.20</b>		<b>\$810.00</b>
<b>Appeals [B430]</b>						
12/02/2020	KHB	AP	Review designation of record (.2); emails with G. Greenwood re counter designation (.2).	0.40	675.00	\$270.00
12/02/2020	GSG	AP	Review designation of record and errata filed re appeal.	0.20	675.00	\$135.00
12/03/2020	GSG	AP	Review designation of record re appeal; notes re additional items for designation.	0.90	675.00	\$607.50
12/03/2020	GSG	AP	Confer with M. Renck re final filing of LBR certification.	0.20	675.00	\$135.00
12/03/2020	GSG	AP	Review BAP LBR re certification, formatting, length, etc.	0.50	675.00	\$337.50
12/03/2020	GSG	AP	Review ADSF response to OSC; notes re same.	0.90	675.00	\$607.50
12/03/2020	GSG	AP	Begin draft response to OSC and opposition to motion for leave to appeal interlocutory order.	1.10	675.00	\$742.50
12/04/2020	GSG	AP	Review Parish response to OSC.	1.80	675.00	\$1,215.00
12/04/2020	GSG	AP	Research/review cases re final appeal/collateral order doctrine.	3.60	675.00	\$2,430.00
12/04/2020	GSG	AP	Draft response to OSC and opposition to motion for leave to appeal interlocutory order.	2.10	675.00	\$1,417.50
12/07/2020	KHB	AP	Review briefs of ASF and Parishes on order to show cause, review cited authorities and consider reply (3.3); confer with G. Greenwood re same (.4).	3.70	675.00	\$2,497.50
12/07/2020	KHB	AP	Emails to Debtor's counsel and Parish counsel re call prior to scheduling conference (.2); call with counsel re scheduling issues (.2); review ASF and Parish oppositions to motions to stay and authorities cited (.8); attend scheduling conference (.9); confer with J. Stang re same (.1).	2.20	675.00	\$1,485.00
12/07/2020	GSG	AP	Review ASF reply and joinder re motion for stay pending appeal.	0.70	675.00	\$472.50
12/07/2020	GSG	AP	Conference call with K. Brown and R. Charles re scheduling conference and adversary proceedings.	0.20	675.00	\$135.00
12/07/2020	GSG	AP	Attend telephonic status conference and preliminary hearing re stay motion.	0.90	675.00	\$607.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/07/2020	GSG	AP	Draft response to OSC re interlocutory order and leave to appeal.	7.60	675.00	\$5,130.00
12/07/2020	GSG	AP	Confer with K. Brown re response to OSC.	0.30	675.00	\$202.50
12/08/2020	JIS	AP	Review response to Parish/Archdiocese brief on OSC re dismissal.	0.60	675.00	\$405.00
12/08/2020	KHB	AP	Work on response to order to show cause.	2.60	675.00	\$1,755.00
12/08/2020	GSG	AP	Review recent RFRA cases cited by Parishes; research/review rules re direct certification of appeal.	1.30	675.00	\$877.50
12/08/2020	GSG	AP	Research/draft response to OSC.	5.40	675.00	\$3,645.00
12/09/2020	KHB	AP	Emails with G. Greenwood re response to order to show cause.	0.20	675.00	\$135.00
12/09/2020	KHB	AP	Work on response to order to show cause (1.1); emails with G. Greenwood re counter designation (.2).	1.30	675.00	\$877.50
12/09/2020	GSG	AP	Review RFRA arguments and prior pleadings; brief research re cases.	2.70	675.00	\$1,822.50
12/09/2020	GSG	AP	Draft/revise response to OSC and opposition to motions for leave to appeal; incorporate K. Brown / J. Stang comments.	8.90	675.00	\$6,007.50
12/10/2020	JIS	AP	Review/revise opposition to motions on OSC.	0.40	675.00	\$270.00
12/10/2020	KHB	AP	Work on response to order to show cause.	1.80	675.00	\$1,215.00
12/10/2020	GSG	AP	Draft/revise OSC response and incorporate final comments of K. Brown / J. Stang.	4.20	675.00	\$2,835.00
12/10/2020	GSG	AP	Draft motion to exceed page limits; review LBR re motion and applications re same.	1.20	675.00	\$810.00
12/10/2020	GSG	AP	Review/revise TOC/TOA and certificates of compliance and service re final filing; confer with M. Renck re same.	0.70	675.00	\$472.50
12/11/2020	JIS	AP	Review and comment on TMI opposition brief.	0.50	675.00	\$337.50
12/11/2020	GSG	AP	Draft Appellee counter designation re record on appeal.	0.80	675.00	\$540.00
12/15/2020	KHB	AP	emails with G. Greenwood re comments to counter designation of record.	0.20	675.00	\$135.00
12/16/2020	IAWN	AP	Review order re status conference	0.10	675.00	\$67.50
12/16/2020	GSG	AP	Review docket and revise calendar re briefing; finalize and file counter designations of record.	0.20	675.00	\$135.00
12/16/2020	GSG	AP	Review order re scheduling conference and topics to be covered.	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/17/2020	KHB	AP	Review Parish opposition to motion to dismiss appeal.	0.20	675.00	\$135.00
12/18/2020	KHB	AP	Review parish opposition to motion to dismiss appeal (1.0); confer with G. Greenwood re reply brief and stipulation for extension (.2); emails with counsel for parishes re stipulation for extension (.2).	1.40	675.00	\$945.00
12/18/2020	KHB	AP	Review order re status conf. reporting on Jan. 26 and motion for stay pending appeal.	0.20	675.00	\$135.00
12/18/2020	LAF	AP	Legal research re: Interlocutory appeal in Tenth Circuit.	0.30	450.00	\$135.00
12/18/2020	GSG	AP	Review Parish response to OSC and opposition re standing; notes re same.	2.60	675.00	\$1,755.00
12/18/2020	GSG	AP	Research/review cases re 10th Circuit Tucker stay pending appeal and ministerial exception.	2.70	675.00	\$1,822.50
12/18/2020	GSG	AP	Confer with K. Brown re Parish response and motion reply.	0.20	675.00	\$135.00
12/18/2020	GSG	AP	Draft stipulation re extension to file reply re motion to dismiss for lack of standing.	0.50	675.00	\$337.50
12/18/2020	GSG	AP	Draft order re stipulation; email R. Charles re 1/1/21 extension date and proposed stipulation and order.	0.80	675.00	\$540.00
12/20/2020	GSG	AP	Research/review cases cited by Parishes re standing and affirmative defenses; notes re same.	3.30	675.00	\$2,227.50
12/21/2020	GSG	AP	Finalize and file stipulation and order re extension of time re BAP briefing on motion to dismiss.	0.30	675.00	\$202.50
12/21/2020	GSG	AP	Research/review decisions re First Amendment and collateral order doctrine, and limitations on ministerial exception; notes re same.	7.60	675.00	\$5,130.00
12/21/2020	GSG	AP	Outline arguments/issues re reply to Parish brief re standing.	0.40	675.00	\$270.00
12/22/2020	KHB	AP	Work on reply to opposition to motion to dismiss Parishes and Trusts from appeal.	2.20	675.00	\$1,485.00
12/23/2020	KHB	AP	Work on reply to Parish opposition to motion to dismiss appeal.	3.30	675.00	\$2,227.50
12/26/2020	KHB	AP	Work on reply brief to Parishes' opposition to motion to dismiss.	4.70	675.00	\$3,172.50
12/27/2020	KHB	AP	Work on reply brief to Parishes opposition to motion to dismiss.	2.40	675.00	\$1,620.00
12/28/2020	JIS	AP	Draft ex parte application for modification of the "Notice" re stay pending appeal hearing.	1.80	675.00	\$1,215.00
12/28/2020	KHB	AP	Work on reply to parish opposition to motion to	4.70	675.00	\$3,172.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			dismiss.			
12/28/2020	KHB	AP	Confer with J. Stang re court's request for information.	0.20	675.00	\$135.00
12/28/2020	GSG	AP	Draft reply re motion to dismiss Parishes' appeal; review cases re same.	10.20	675.00	\$6,885.00
12/29/2020	JIS	AP	Call with Ken Brown to review response to Court's Hearing Notice.	0.80	675.00	\$540.00
12/29/2020	KHB	AP	Emails with G. Greenwood re reply to opposition to motion to dismiss.	0.20	675.00	\$135.00
12/29/2020	KHB	AP	Work on response to court's request for information (dkt 580) and review authorities re disposition of key legal issues by partial summary judgment motions (2.3); confer with J. Stang re response to dkt no. 580 (.8).	3.10	675.00	\$2,092.50
12/29/2020	GSG	AP	Draft reply re motion to dismiss; review cases re same.	6.20	675.00	\$4,185.00
12/29/2020	GSG	AP	Review/revise reply brief for length.	1.80	675.00	\$1,215.00
12/30/2020	KHB	AP	Work on Reply to Parish opposition to motion to dismiss appeal.	2.70	675.00	\$1,822.50
12/30/2020	GSG	AP	Draft/revise reply re motion to dismiss.	1.20	675.00	\$810.00
12/30/2020	GSG	AP	Confer with M. Renck and H. Phan re BAP filing.	0.20	675.00	\$135.00
12/31/2020	GSG	AP	Review and finalize tables re BAP reply brief.	0.40	675.00	\$270.00
				<b>127.20</b>		<b>\$85,792.50</b>

### Bankruptcy Litigation [L430]

12/01/2020	GSG	BL	Review answers and affirmative defenses of defendants.	1.70	675.00	\$1,147.50
12/01/2020	GSG	BL	Review LBR re summary judgment motions (.2); research re 10th Cir. cases re summary adjudication of affirmative defenses (2.2); review court opinions re summary judgment standards and partial summary judgment (1.1).	3.50	675.00	\$2,362.50
12/02/2020	GSG	BL	Review additional answers and defenses filed by Parishes.	0.60	675.00	\$405.00
12/02/2020	GSG	BL	Draft partial summary judgment motion re RE Trust defenses.	6.40	675.00	\$4,320.00
12/03/2020	GSG	BL	Draft MSA re legal issues.	1.80	675.00	\$1,215.00
12/03/2020	GSG	BL	Review cases re 12(f) dismissal of affirmative defenses.	0.50	675.00	\$337.50



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/11/2020	GSG	BL	Draft partial summary judgment re RFRA defense.	3.60	675.00	\$2,430.00
12/14/2020	GSG	BL	Research/review cases re First Amendment free exercise clause, autonomy doctrine, and ministerial exception.	3.30	675.00	\$2,227.50
12/14/2020	GSG	BL	Draft motion for partial summary judgment re affirmative defenses.	5.30	675.00	\$3,577.50
12/15/2020	GSG	BL	Draft/revise undisputed facts re summary judgment with citations to answers.	6.30	675.00	\$4,252.50
12/16/2020	IDS	BL	Review J. Thema order regarding hearing.	0.20	675.00	\$135.00
12/16/2020	GSG	BL	Research/review additional cases re unincorporated associations re partial summary judgment.	2.40	675.00	\$1,620.00
12/16/2020	GSG	BL	Draft/revise motion for partial summary judgment.	5.10	675.00	\$3,442.50
12/17/2020	GSG	BL	Review Thuma opinion re corporation sole.	0.30	675.00	\$202.50
12/17/2020	GSG	BL	Revise formatting and final cites to MSJ.	0.50	675.00	\$337.50
12/22/2020	JIS	BL	Review Hochman memo on RFRA and First Amendment for motion re status conference order.	0.50	675.00	\$337.50
12/22/2020	JIS	BL	Revise RFRA memo.	0.20	675.00	\$135.00
12/23/2020	JIS	BL	Call Ken Brown regarding summary judgment issues.	0.20	675.00	\$135.00
12/23/2020	KHB	BL	Emails with J. Stang and G. Greenwood re motions for partial summary judgment.	0.20	675.00	\$135.00
12/27/2020	GSG	BL	Review K. Brown notes against current outline and arguments; notes re same.	1.10	675.00	\$742.50
12/29/2020	LAF	BL	Locate NM case documents.	0.30	450.00	\$135.00
12/30/2020	KHB	BL	Work on motion for partial summary judgment/RFRA and First Amendment.	4.20	675.00	\$2,835.00
12/30/2020	GSG	BL	Confer with L. Forrester re Blue Canyon Briefing and email re same.	0.20	675.00	\$135.00
12/31/2020	KHB	BL	Review authorities on First Amendment defense and prepare motion for partial summary judgment re same.	4.20	675.00	\$2,835.00
12/31/2020	GSG	BL	Review Blue Canyon re procedural background; review lower court and appellate docket re briefing and copies.	0.70	675.00	\$472.50
				<b>53.30</b>		<b>\$35,910.00</b>

**Claims Admin/Objections[B310]**

12/20/2020	GNB	CO	Telephone conference with James I. Stang regarding	0.80	675.00	\$540.00
------------	-----	----	--	------	--------	----------

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			ch. 7 tort claimants' issues in Davenport Diocese case in advance of tomorrow's hearing (.05); Research regarding same (.55); Draft email to James I. Stang regarding same (.2)			
12/20/2020	GNB	CO	Draft email to James I. Stang regarding handling of ch. 7 tort claimants' issues in Davenport Diocese case.	0.20	675.00	\$135.00
				<u>1.00</u>		<u>\$675.00</u>

**General Creditors Comm. [B150]**

12/04/2020	IDS	GC	Attend SCC meeting.	1.00	675.00	\$675.00
12/04/2020	IDS	GC	Review, update asset values for SCC meeting.	0.80	675.00	\$540.00
12/09/2020	IDS	GC	Attend committee call regarding mediation.	0.50	675.00	\$337.50
12/11/2020	IDS	GC	Attend counsel call regarding mediation.	1.00	675.00	\$675.00
12/14/2020	IDS	GC	Email to P. Linnerburger regarding permitted parishes.	0.10	675.00	\$67.50
12/16/2020	JIS	GC	Call with Committee regarding response to Debtor's counteroffer.	1.10	675.00	\$742.50
12/16/2020	IDS	GC	Attend committee call regarding mediation.	1.20	675.00	\$810.00
12/18/2020	JIS	GC	Call with state court counsel regarding response to mediation offer.	1.40	675.00	\$945.00
12/18/2020	JIS	GC	Call with survivor re case status.	0.20	675.00	\$135.00
12/18/2020	JIS	GC	Call with survivor regarding case status.	0.20	675.00	\$135.00
12/18/2020	IDS	GC	Telephone call with SCC regarding mediation, litigation, insurance.	1.20	675.00	\$810.00
12/20/2020	JIS	GC	Call regarding disposition of Chapter 7 trustee claims in Davenport chapter 11 case.	0.20	675.00	\$135.00
12/20/2020	JIS	GC	Call B. Hall regarding 12/21 hearing on chapter 7 trustee claims in chapter 11 case.	0.30	675.00	\$202.50
12/21/2020	JIS	GC	Call B. Hall regarding Davenport minute orders re chapter 7 trustee involvement.	0.20	675.00	\$135.00
12/21/2020	JIS	GC	Hearing regarding chapter 7 trustee involvement.	1.10	675.00	\$742.50
12/23/2020	JIS	GC	Draft email to committee regarding status of case, mediation and litigation.	0.30	675.00	\$202.50
12/28/2020	JIS	GC	Call with survivor regarding case status.	0.10	675.00	\$67.50
12/30/2020	JIS	GC	Draft email to Committee regarding upcoming issues re counteroffer.	0.20	675.00	\$135.00
				<u>11.10</u>		<u>\$7,492.50</u>

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Hearings</b>						
12/07/2020	JIS	H	Attend hearing for status of adversary proceedings, chapter 11 case and motion for abandonment.	1.00	675.00	\$675.00
12/07/2020	JIS	H	Call B. Hall re issues related to status conference hearing.	0.10	675.00	\$67.50
				<b>1.10</b>		<b>\$742.50</b>
<b>Insurance Coverage</b>						
12/01/2020	IAWN	IC	Review settlement agreements	1.00	675.00	\$675.00
12/02/2020	IAWN	IC	Review Elaesser 408 letter	0.10	675.00	\$67.50
12/02/2020	IAWN	IC	Analyze settlement agreements, dilution exhibit from mediation 2.2, draft email to Hall, Monagle and Ford re same, .1	3.30	675.00	\$2,227.50
12/02/2020	JIS	IC	Call from Iain Nasatir regarding insurance analysis of first encounter agreements.	0.20	675.00	\$135.00
12/03/2020	IAWN	IC	Telephone conference with Hall, Monagle and Ford re claims	1.00	675.00	\$675.00
12/04/2020	IAWN	IC	Prepare for call w/ debtor re claims	1.20	675.00	\$810.00
12/04/2020	IAWN	IC	Telephone conference with Elaesser and Stang regarding claims	0.30	675.00	\$202.50
12/20/2020	IAWN	IC	Prep for call with debtor, review insurance and claims	2.20	675.00	\$1,485.00
12/21/2020	IAWN	IC	TC with Stang, Ford, Elaessar, Murray, Carter re insurance	1.20	675.00	\$810.00
12/21/2020	IAWN	IC	Review Ford and Elaesser emails re meeting	0.10	675.00	\$67.50
12/23/2020	IAWN	IC	Review lengthy summary of call with Diocese and other updates and strategy	0.50	675.00	\$337.50
12/26/2020	IAWN	IC	Review Stang email to debtor re needed information	0.10	675.00	\$67.50
12/28/2020	IAWN	IC	Review Ford Elaesser email re Murray information	0.10	675.00	\$67.50
12/28/2020	IAWN	IC	Review and analyze master occurrence chart and coverage chart	1.00	675.00	\$675.00
12/29/2020	IAWN	IC	Exchange email from Elaesser re master claims chart	0.10	675.00	\$67.50
12/29/2020	IAWN	IC	Review emails from debtor and TCC counsel re timing for call	0.10	675.00	\$67.50
12/30/2020	IAWN	IC	Exchange emails with Hall re attachments to Elaesser email	0.10	675.00	\$67.50
12/30/2020	IAWN	IC	Review settlements and master chart and analyze	0.80	675.00	\$540.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/30/2020	IAWN	IC	Draft and send email to Hall, Monagle, Ford, Stang re allocation	0.10	675.00	\$67.50
12/30/2020	IAWN	IC	Exchange emails with Hall and Ford re telephone call with Elaesser tomorrow	0.10	675.00	\$67.50
12/30/2020	IAWN	IC	Review Stang and Halll emails re charts	0.10	675.00	\$67.50
12/30/2020	JIS	IC	Call with Ian Nasatir regarding upcoming meeting regarding insurance policies.	0.20	675.00	\$135.00
12/31/2020	IAWN	IC	TC with Anderson, Carter, Elaesser, Ford, Monagle, Hall, Walker, Stang re insurance	1.30	675.00	\$877.50
12/31/2020	IAWN	IC	Prepare for call with debtor re insurance, review Spokane severity chart	1.30	675.00	\$877.50
12/31/2020	IAWN	IC	TC with Stang re debtor call	0.10	675.00	\$67.50
12/31/2020	IAWN	IC	TC w/ Monagle, Hall and fFord re claims	1.10	675.00	\$742.50
12/31/2020	IAWN	IC	TC with Stang re call with Hall	0.10	675.00	\$67.50
12/31/2020	IAWN	IC	Exchange emails and telephone calls with Ford re needed information, .2, exchange emails with Hall and Ford re draft email, .1; review available information and assess missing information, .8, draft email and revise same re missing information and forward request to debtor, .8	1.90	675.00	\$1,282.50
12/31/2020	JIS	IC	Call with Iain Nasatir re insurance program.	0.20	675.00	\$135.00
				<b>19.90</b>		<b>\$13,432.50</b>

### Mediation

12/02/2020	JIS	ME	Call from B. Hall regarding Debtor's response to sources of settlement offer.	0.30	675.00	\$202.50
12/04/2020	IAWN	ME	Draft bullet points for mediator re settlements and dilution	1.00	675.00	\$675.00
12/08/2020	IAWN	ME	Review Stang settlement letter and hall and other comments, .5 comment re same, .1	0.60	675.00	\$405.00
12/16/2020	IAWN	ME	Review debtor rejection of offer	0.10	675.00	\$67.50
12/16/2020	KHB	ME	Review debtor's rejection of settlement offer.	0.10	675.00	\$67.50
12/16/2020	IDS	ME	Review Archdiocese of Santa Fe offer and email to James Stang regarding same.	0.20	675.00	\$135.00
				<b>2.30</b>		<b>\$1,552.50</b>

### Plan & Disclosure Stmt. [B320]

12/04/2020	JIS	PD	State Court Counsel meeting regarding counteroffer.	0.90	675.00	\$607.50
------------	-----	----	---	------	--------	----------

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/04/2020	JIS	PD	Call with Ford Elsaesser regarding settlement offer.	0.20	675.00	\$135.00
12/07/2020	JIS	PD	Finalize and send counteroffer draft to Committee/State Court Counsel.	0.20	675.00	\$135.00
12/09/2020	JIS	PD	Attend committee meeting regarding counteroffer to AD.	0.50	675.00	\$337.50
12/10/2020	JIS	PD	Call F. Elsaesser regarding response to AD offer (.2) and finalize letter re same (.1).	0.30	675.00	\$202.50
12/10/2020	JIS	PD	Call B. Hall regarding settlement letter to Archdiocese.	0.30	675.00	\$202.50
12/16/2020	JIS	PD	Review and respond to Debtor's rejection of Committee's offer.	0.50	675.00	\$337.50
12/21/2020	JIS	PD	Call with Debtor counsel regarding settlement issues.	1.20	675.00	\$810.00
12/26/2020	JIS	PD	Review emails regarding follow up to call with Debtor and revise draft email based on those comments.	0.20	675.00	\$135.00
12/31/2020	JIS	PD	Conference call with Hall, Monagle, Ford, Nasatir regarding insurance strategy.	1.30	675.00	\$877.50
12/31/2020	JIS	PD	Call with Debtor's counsel regarding settlement offers and insurance coverage.	1.40	675.00	\$945.00
				<u>7.00</u>		<u>\$4,725.00</u>

**TOTAL SERVICES FOR THIS MATTER:**

**\$151,132.50**

---

**Expenses**

12/18/2020	RE2	SCAN/COPY ( 12 @0.10 PER PG)	1.20
12/18/2020	RE2	SCAN/COPY ( 30 @0.10 PER PG)	3.00
12/18/2020	RE2	SCAN/COPY ( 27 @0.10 PER PG)	2.70
12/31/2020	OS	Everlaw, Database for Month of December, Inv. 34010	500.00
<b>Total Expenses for this Matter</b>			<b>\$506.90</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 12/31/2020**

**Total Fees \$151,132.50**

**Total Expenses 506.90**

**Total Due on Current Invoice \$151,639.40**

**Outstanding Balance from prior invoices as of 12/31/2020 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

---

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$72,296.22
126833	09/30/2020	\$7,512.50	\$567.41	\$8,079.91
126904	10/31/2020	\$89,325.00	\$2,234.47	\$91,559.47
126905	11/30/2020	\$86,197.50	\$641.07	\$86,838.57

**Total Amount Due on Current and Prior Invoices: \$756,589.21**



# **Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

January 31, 2021

Invoice 127999

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

## **STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 01/31/2021**

FEES	\$183,875.00
------	--------------

EXPENSES	\$2,017.29
----------	------------

<b>TOTAL CURRENT CHARGES</b>	<b>\$185,892.29</b>
------------------------------	---------------------

<b>BALANCE FORWARD</b>	<b>\$756,589.21</b>
------------------------	---------------------

<b>LAST PAYMENT</b>	<b>\$309,016.84</b>
---------------------	---------------------

<b>TOTAL BALANCE DUE</b>	<b>\$633,464.66</b>
--------------------------	---------------------

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	141.20	\$95,310.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	21.70	\$14,647.50
IDS	Scharf, Ilan D.	Partner	675.00	15.10	\$10,192.50
JIS	Stang, James I.	Partner	675.00	26.90	\$18,157.50
KHB	Brown, Kenneth H.	Partner	675.00	66.10	\$44,617.50
LAF	Forrester, Leslie A.	Other	475.00	2.00	\$950.00
				<hr/> 273.00	<hr/> \$183,875.00

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AP	Appeals [B430]	120.60	\$81,205.00
BL	Bankruptcy Litigation [L430]	99.40	\$66,895.00
CA	Case Administration [B110]	0.20	\$135.00
CP	Compensation Prof. [B160]	1.10	\$742.50
GC	General Creditors Comm. [B150]	13.30	\$8,977.50
HE	Hearing	2.60	\$1,755.00
IC	Insurance Coverage	23.00	\$15,525.00
ME	Mediation	11.80	\$7,965.00
PD	Plan & Disclosure Stmt. [B320]	1.00	\$675.00
		273.00	<hr/> \$183,875.00

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 127999  
January 31, 2021

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Bloomberg	\$462.50
Conference Call [E105]	\$599.81
Lexis/Nexis- Legal Research [E	\$299.98
Outside Services	\$500.00
Pacer - Court Research	\$73.90
Reproduction/ Scan Copy	\$81.10
	<hr/>
	\$2,017.29

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Appeals [B430]</b>						
01/04/2021	JIS	AP	Review motion for certification of BAP appeal to the 10th Circuit.	0.20	675.00	\$135.00
01/04/2021	KHB	AP	Review motion for direct appeal (.2); confer with J. Stang re same (.1).	0.30	675.00	\$202.50
01/04/2021	GSG	AP	Confer re final filing and service of BAP reply re motion to dismiss.	0.10	675.00	\$67.50
01/04/2021	GSG	AP	Receive and circulate debtor's motion for direct certification of appeal; emails re same.	0.30	675.00	\$202.50
01/05/2021	KHB	AP	Confer with Rob Charles re motion for direct appeal (.2); emails with Debtor's counsel re same (.2); review motion for direct appeal (.8); confer with J. Stang re same (.1).	1.30	675.00	\$877.50
01/05/2021	KHB	AP	Confer with J. Stang re motions for partial summary judgment (.1); emails with B. Hall and L. Ford re potential certification issues and review NM statute re same (.4).	0.50	675.00	\$337.50
01/05/2021	GSG	AP	Review direct certification rules and calendar response deadline.	0.30	675.00	\$202.50
01/05/2021	GSG	AP	Research/review 10th Circuit cases re direct appeal and standards.	5.30	675.00	\$3,577.50
01/06/2021	JIS	AP	Call Ken Brown re appeal and certification issues.	0.10	675.00	\$67.50
01/06/2021	KHB	AP	Confer with G. Greenwood re opposition to motion for direct certification and review memo on legal issues (.5); review authorities re same (.4); confer with J. Stang re same (.1); emails with Levi Monagle re certification issues (.1).	1.10	675.00	\$742.50
01/06/2021	GSG	AP	Research/review articles re church autonomy doctrine.	1.30	675.00	\$877.50
01/06/2021	GSG	AP	Review Fox Declaration re Canon Law and parish history.	1.90	675.00	\$1,282.50
01/06/2021	GSG	AP	Confer with K. Brown re certification of direct appeal.	0.30	675.00	\$202.50
01/06/2021	GSG	AP	Research/review cases re leave to appeal vs direct certification.	2.70	675.00	\$1,822.50
01/07/2021	KHB	AP	Emails with counsel for Debtor and Parishes re motion for certification for direct appeal (.3); work on stipulation re briefing schedule (.4); emails with G. Greenwood re same (.2).	0.90	675.00	\$607.50
01/07/2021	GSG	AP	Research re 158(d) direct certification and interpretation of factors; notes re same.	1.60	675.00	\$1,080.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/07/2021	GSG	AP	Draft stipulation and order re extension of time to file opposition to direct certification.	2.50	675.00	\$1,687.50
01/07/2021	GSG	AP	Review K. Brown comments and finalize order and stipulation.	0.30	675.00	\$202.50
01/08/2021	GSG	AP	Emails re final approval of stipulated extension; confer with M. Renck re certification, service, and filing.	0.20	675.00	\$135.00
01/11/2021	KHB	AP	Review BAP order denying stipulation for extension (.1); emails with Parish and Debtor's counsel re one week extension (.2); work on stipulation and call with Gail Greenwood re same (.2).	0.50	675.00	\$337.50
01/11/2021	GSG	AP	Review order denying open extension and circulate.	0.10	675.00	\$67.50
01/11/2021	GSG	AP	Draft revised stipulation re extension to file response to direct certification (.4); draft order and confer re filing/attachments (.3).	0.70	675.00	\$472.50
01/11/2021	GSG	AP	Emails to/from counsel re further stipulation re extension to respond to direct certification.	0.20	675.00	\$135.00
01/11/2021	GSG	AP	Review cases cited by Appellants re direct appeal.	1.40	675.00	\$945.00
01/11/2021	GSG	AP	Draft opposition to direct appeal; outline arguments.	2.80	675.00	\$1,890.00
01/12/2021	KHB	AP	Work on opposition to motion for direct appeal.	0.60	675.00	\$405.00
01/12/2021	GSG	AP	Review/research BAP opinions re direct appeal.	0.30	675.00	\$202.50
01/12/2021	GSG	AP	Confer with M. Renck re filing and service of stipulation and order; review and calendar order granting extension.	0.20	675.00	\$135.00
01/12/2021	GSG	AP	Draft opposition to direct appeal (intro, facts, and legal standard).	8.40	675.00	\$5,670.00
01/13/2021	KHB	AP	Confer with J. Stang re opposition to motion for direct appeal.	0.20	675.00	\$135.00
01/13/2021	GSG	AP	Draft opposition to motion for direct certification of appeal re standing issue.	7.80	675.00	\$5,265.00
01/14/2021	KHB	AP	Work on opposition to motion for direct appeal and review authorities re same.	3.40	675.00	\$2,295.00
01/14/2021	GSG	AP	Review additional cases re opposition to direct appeal, including entanglement doctrine and unpublished cases cited by parishes.	3.20	675.00	\$2,160.00
01/14/2021	GSG	AP	Emails to/from K. Brown re opposition to direct appeal.	0.40	675.00	\$270.00
01/14/2021	GSG	AP	Draft opposition to direct certification motion re religious liberty defenses.	7.90	675.00	\$5,332.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/15/2021	KHB	AP	Work on opposition to motion for direct appeal.	3.70	675.00	\$2,497.50
01/15/2021	LAF	AP	Legal research re: Direct appeal in the Tenth Circuit.	1.00	475.00	\$475.00
01/15/2021	GSG	AP	Research additional caselaw re mixed questions of fact on direct appeal.	2.40	675.00	\$1,620.00
01/15/2021	GSG	AP	Draft/revise opposition to direct appeal.	3.40	675.00	\$2,295.00
01/15/2021	GSG	AP	Revise/edit length of opposition per FRBP 8013.	2.30	675.00	\$1,552.50
01/16/2021	GSG	AP	Calls with K. Brown (.3) re direct certification of appeal and additional arguments; notes re same (.2).	0.50	675.00	\$337.50
01/18/2021	KHB	AP	Work on opposition to motion for direct appeal and review authorities re same.	2.50	675.00	\$1,687.50
01/18/2021	GSG	AP	Research re FRAP 5-6 and procedures for briefing before 10th Circuit.	0.40	675.00	\$270.00
01/18/2021	GSG	AP	Review 10th Circuit local rules re briefing, timing, and modification of rules re review by permission.	0.50	675.00	\$337.50
01/18/2021	GSG	AP	Draft/revise opposition to direct certification; incorporate additional arguments re standing authority and precedent; edit per word/page limits and circulate to K. Brown.	6.60	675.00	\$4,455.00
01/19/2021	KHB	AP	Work on opposition to motion to certify direct appeal.	5.30	675.00	\$3,577.50
01/20/2021	KHB	AP	Work on opposition to motion to certify direct appeal analyze authorities re same.	7.30	675.00	\$4,927.50
01/21/2021	KHB	AP	Work on opposition to motion to certify direct appeal analyze authorities re same.	5.00	675.00	\$3,375.00
01/22/2021	KHB	AP	Confer with G. Greenwood re opposition to motion for certification.	0.20	675.00	\$135.00
01/22/2021	GSG	AP	Call with K. Brown re appeal status and direct certification.	0.10	675.00	\$67.50
01/22/2021	GSG	AP	Revise opposition re direct certification re additional cites and authority.	5.50	675.00	\$3,712.50
01/24/2021	KHB	AP	Work on opposition to motion for certification.	1.60	675.00	\$1,080.00
01/24/2021	GSG	AP	Edit/revise opposition re direct certification (3.4); blackline and email K. Brown re same (.1).	3.50	675.00	\$2,362.50
01/25/2021	JIS	AP	Review response to certification motion.	0.40	675.00	\$270.00
01/25/2021	JIS	AP	Review supplemental authority for certification motion and review cases cited therein.	0.20	675.00	\$135.00
01/25/2021	KHB	AP	Work on opposition to motion for certification (.2); confer with J. Stang re same (.1); emails with G. Greenwood re same (.2) ; review supplementary	2.50	675.00	\$1,687.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			submission of authorities by Parishes in opposition to motion to dismiss appeal and prepare response (1.8); emails with J. Stang and G. Greenwood re same (.2).			
01/25/2021	GSG	AP	Review K. Brown comments and emails re direct appeal.	0.30	675.00	\$202.50
01/25/2021	GSG	AP	Revise and finalize opposition to direct appeal, including tables.	1.40	675.00	\$945.00
01/25/2021	GSG	AP	Review parish response re supplemental authorities and emails re same.	0.10	675.00	\$67.50
01/26/2021	KHB	AP	Work on response to submission of supplemental authority in opposition to motion to dismiss by Parishes.	0.40	675.00	\$270.00
01/26/2021	GSG	AP	Confer with M. Renck re BAP filing.	0.10	675.00	\$67.50
01/26/2021	GSG	AP	Review Supplemental Authorities submitted by Parishes and FRBP 8014; and calendar response.	0.90	675.00	\$607.50
01/26/2021	GSG	AP	Prepare response re Supplemental Authorities.	0.70	675.00	\$472.50
01/26/2021	GSG	AP	Review K. Brown comments and edit response re word count.	0.30	675.00	\$202.50
01/26/2021	GSG	AP	Review further Supplemental Authorities filed by Parishes with bankruptcy court (.1); cross-check bankruptcy docket re pleadings re stay pending appeal (.2).	0.30	675.00	\$202.50
01/26/2021	GSG	AP	Review Nken cites re stay pending appeal; prepare response to Supplemental Authorities re dismissal cases.	1.10	675.00	\$742.50
01/27/2021	KHB	AP	Emails with G. Greenwood re meaning of docket entry.	0.20	675.00	\$135.00
01/27/2021	GSG	AP	Review docket and emails re reply to Direct Certification opposition.	0.20	675.00	\$135.00
01/28/2021	KHB	AP	Emails with G. Greenwood re response to parish filing of supplemental authority	0.10	675.00	\$67.50
01/28/2021	GSG	AP	Confer with M. Renck re BAP filings and service; calendar additional dates.	0.30	675.00	\$202.50
				<b>120.60</b>		<b>\$81,205.00</b>

#### **Bankruptcy Litigation [L430]**

01/04/2021	JIS	BL	Review email string re status of summary judgment motions in avoidance litigation.	0.10	675.00	\$67.50
01/04/2021	JIS	BL	Call with Ken Brown regarding summary judgment	0.20	675.00	\$135.00



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			motion and direct appeal motion.			
01/04/2021	KHB	BL	Work on motion for partial summary judgment on RFRA/Church Autonomy and First Amendment (5.0); work on response to court's request for information in connection with status conference (1.1); confer with J. Stang re same (.1).	6.20	675.00	\$4,185.00
01/04/2021	GSG	BL	Emails to/from K. Brown re summary judgment.	0.20	675.00	\$135.00
01/04/2021	GSG	BL	Review LBR re motions and timing.	0.20	675.00	\$135.00
01/05/2021	JIS	BL	Call J. Anderson regarding RFRA and First Amendment issues on standing.	0.10	675.00	\$67.50
01/05/2021	GSG	BL	Review K. Brown comments re status hearing and docket re pending motions.	0.70	675.00	\$472.50
01/05/2021	GSG	BL	Review K. Brown comments re MSJ (.5); review additional First Amendment cases (.3).	0.80	675.00	\$540.00
01/05/2021	GSG	BL	Emails re Blue Canyon briefing.	0.20	675.00	\$135.00
01/07/2021	KHB	BL	Work on motion for partial summary judgment re parishes lack of capacity to be beneficiaries of a trust prior to incorporation.	3.40	675.00	\$2,295.00
01/07/2021	GSG	BL	Review Blue Canyon appellate briefs re MSJ issues; notes re same.	2.80	675.00	\$1,890.00
01/08/2021	JIS	BL	Call with Ken Brown regarding status of summary judgment motions in pending adversary proceedings on real and personal property.	0.70	675.00	\$472.50
01/08/2021	JIS	BL	Review emails regarding structure of summary judgment motions on property adversary proceedings.	0.20	675.00	\$135.00
01/08/2021	JIS	BL	Review, revise and draft status conference statement response.	1.20	675.00	\$810.00
01/08/2021	KHB	BL	Discuss litigation strategy and partial summary judgment motions with J. Stang (.7); discussions with G. Greenwood re same (.3); work on partial summary judgment motion (4.3); confer with J. Stang re response to court's request for information (.1).	5.40	675.00	\$3,645.00
01/08/2021	LAF	BL	Research re: Unincorporated Ass'n Act.	0.50	475.00	\$237.50
01/08/2021	GSG	BL	Confer with L. Forrester and review documents re Uniform Unincorp Nonprofit Associations; emails re same.	0.40	675.00	\$270.00
01/08/2021	GSG	BL	Emails to/from K. Brown and notes re additional discovery issues.	0.20	675.00	\$135.00
01/08/2021	GSG	BL	Review answers to DLF Trust and Unrecorded	4.10	675.00	\$2,767.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Interests complaints re affirmative defenses and parties; notes re same.			
01/08/2021	GSG	BL	Review exhibits to Salgado Declaration re DLF Trust and bank statements; notes re same.	1.50	675.00	\$1,012.50
01/08/2021	GSG	BL	Confer with K. Brown re summary judgment structure and timing.	0.30	675.00	\$202.50
01/08/2021	GSG	BL	Draft/revise summary judgment re First Amendment defenses.	1.60	675.00	\$1,080.00
01/11/2021	KHB	BL	Work on motion for partial summary judgment.	4.50	675.00	\$3,037.50
01/11/2021	GSG	BL	Research/shepardize cases and 10th Circuit law re MSJ affirmative defense issues.	4.00	675.00	\$2,700.00
01/12/2021	KHB	BL	Work on motion for partial summary judgment on unincorporated association issue.	2.80	675.00	\$1,890.00
01/12/2021	LAF	BL	Legal research re: Summary judgment motions in Bankr. N.M.	0.50	475.00	\$237.50
01/13/2021	JIS	BL	Review draft Motion for Summary Judgment re unincorporated associations.	0.30	675.00	\$202.50
01/13/2021	KHB	BL	Confer with J. Stang re motions for partial summary judgment.	0.20	675.00	\$135.00
01/18/2021	JIS	BL	Review status conference statement and make substantial revisions.	3.00	675.00	\$2,025.00
01/18/2021	JIS	BL	Call Kenneth Brown regarding status conference statement and adversary proceeding summary judgment motions.	0.40	675.00	\$270.00
01/18/2021	KHB	BL	Confer with J. Stang re status of motions for partial SJMs and status conference statement to court.	0.20	675.00	\$135.00
01/18/2021	IDS	BL	Review and comment on status report.	0.80	675.00	\$540.00
01/19/2021	JIS	BL	Review Iain Nasatir comments to Notice of Hearing response.	0.20	675.00	\$135.00
01/19/2021	JIS	BL	Review Kenneth Brown comments to Notice of Hearing response.	0.10	675.00	\$67.50
01/19/2021	KHB	BL	Emails to/from counsel for Debtor and Parishes re meet and confer for upcoming status conference.	0.20	675.00	\$135.00
01/19/2021	GSG	BL	Emails with ASF and Parish counsel re meeting.	0.10	675.00	\$67.50
01/20/2021	GSG	BL	Draft motion for partial summary judgment re religious liberty defenses.	4.00	675.00	\$2,700.00
01/21/2021	KHB	BL	Confer with counsel for Debtor and parishes re status conference and cross motions for summary judgment on Religious Liberty Defenses (.4); confer with J. Stang re same (.1).	0.50	675.00	\$337.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/21/2021	GSG	BL	Follow up research re RFRA and First Am. defenses.	1.60	675.00	\$1,080.00
01/21/2021	GSG	BL	Draft motion for partial summary judgment.	3.90	675.00	\$2,632.50
01/21/2021	GSG	BL	Confer with K. Brown re summary judgment posture and timing.	0.10	675.00	\$67.50
01/21/2021	GSG	BL	Conference call with ASF/Parish counsel re 1/26 status conference and summary adjudications.	0.30	675.00	\$202.50
01/21/2021	GSG	BL	Review/summarize applicable diocese cases and issues.	1.90	675.00	\$1,282.50
01/23/2021	JIS	BL	Call Ken Brown regarding adversary proceedings and appeal status.	0.60	675.00	\$405.00
01/25/2021	JIS	BL	Call L. Ford regarding insurance provisions in response to Notice of Hearing.	0.20	675.00	\$135.00
01/25/2021	JIS	BL	Review and revise draft response to notice of hearing regarding fees/status of adversary proceedings/insurance.	1.30	675.00	\$877.50
01/25/2021	JIS	BL	Call Ken Brown regarding debtor's response to the notice of hearing.	0.20	675.00	\$135.00
01/25/2021	JIS	BL	Skim review of debtor's response to notice of hearing.	0.20	675.00	\$135.00
01/25/2021	KHB	BL	Review status conference statements (.5); confer with J. Stang re same (.2).	0.70	675.00	\$472.50
01/25/2021	GSG	BL	Review responses re status hearing, dismissal, and costs; circulate same.	0.50	675.00	\$337.50
01/25/2021	GSG	BL	Research/review additional cases re First Amendment defenses.	0.80	675.00	\$540.00
01/25/2021	GSG	BL	Draft summary judgment motion re affirmative defenses.	4.30	675.00	\$2,902.50
01/26/2021	KHB	BL	Attend Status conference on Adversary Proceedings (2.3); prepare for same (.4); telephone calls with J. Stang and Ilan Scharf re same (.2); review email from G. Greenwood re motion for summary judgment on religious liberty defenses (.1)	3.00	675.00	\$2,025.00
01/26/2021	GSG	BL	Draft and blackline MSJ re religious liberty defenses and circulate.	1.20	675.00	\$810.00
01/26/2021	GSG	BL	Review authorities and pleadings circulated by L. Forrester re MSJ.	0.60	675.00	\$405.00
01/26/2021	GSG	BL	Review K. Brown insert and begin preparation of MSJ re NM Statutory defense.	0.20	675.00	\$135.00
01/26/2021	GSG	BL	Attend status hearing re motion for stay pending	2.40	675.00	\$1,620.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			appeal and responses to court order.			
01/27/2021	KHB	BL	work on response to Parish submission of supplemental authorities.	1.00	675.00	\$675.00
01/27/2021	GSG	BL	Prepare chart of consolidated trust defenses re partial summary judgment.	0.60	675.00	\$405.00
01/27/2021	GSG	BL	Emails to/from K. Brown and revise response re Supplemental Authorities.	0.30	675.00	\$202.50
01/27/2021	GSG	BL	Review incorporation information and prepare chart re applicable defendants and dates; confer with M. Renck re same.	1.30	675.00	\$877.50
01/27/2021	GSG	BL	Draft/revise MSJ re New Mexico statute; draft consolidated facts re same.	5.20	675.00	\$3,510.00
01/28/2021	KHB	BL	Work on opposition to parish filing of supplemental authority to motion for relief for stay (.1); review minute order re status conference (.1)	0.20	675.00	\$135.00
01/28/2021	GSG	BL	Review pastor declarations re parish history and formation; prepare MSJ facts re same.	3.30	675.00	\$2,227.50
01/28/2021	GSG	BL	Review parish incorporation docs from M. Renck.	0.20	675.00	\$135.00
01/28/2021	GSG	BL	Follow-up research and update/revise MSJ re NMSA.	4.70	675.00	\$3,172.50
01/29/2021	KHB	BL	Confer with G. Greenfield re summary judgment on unincorporated associations.	0.20	675.00	\$135.00
01/29/2021	GSG	BL	Review defendant arguments re trust defenses; notes re same.	1.30	675.00	\$877.50
01/29/2021	GSG	BL	Review/revise MSJ re trust defenses; comments re same.	2.80	675.00	\$1,890.00
01/29/2021	GSG	BL	Confer with K. Brown re NMSA arguments and MSJ.	0.20	675.00	\$135.00
01/29/2021	GSG	BL	Follow-up research re church property disputes.	1.30	675.00	\$877.50
				<b>99.40</b>		<b>\$66,895.00</b>

#### Case Administration [B110]

01/18/2021	IDS	CA	Telephone call with James Stang regarding status conference.	0.20	675.00	\$135.00
				<b>0.20</b>		<b>\$135.00</b>

#### Compensation Prof. [B160]

01/08/2021	JIS	CP	Review August bill.	0.50	675.00	\$337.50
01/18/2021	JIS	CP	Review 9/2020 invoice.	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/25/2021	JIS	CP	Review bills from 8/20 to December 2020 and forward to Debtor and Committee chair.	0.40	675.00	\$270.00
				<b>1.10</b>		<b>\$742.50</b>

### General Creditors Comm. [B150]

01/05/2021	IDS	GC	Attend SCC call regarding mediation, case status.	1.50	675.00	\$1,012.50
01/06/2021	JIS	GC	Committee call re case status and settlement options.	1.00	675.00	\$675.00
01/07/2021	JIS	GC	Review pleadings related to the opening of chapter 7 cases.	0.10	675.00	\$67.50
01/08/2021	JIS	GC	State Court counsel call regarding settlement offer and chapter 7 issues affecting the chapter 11 estate	1.30	675.00	\$877.50
01/08/2021	JIS	GC	Call Sophia Lee re call to J. Thuma chambers regarding chapter 7 cases.	0.10	675.00	\$67.50
01/13/2021	JIS	GC	Call B. Hall regarding upcoming state court counsel call (.3) and call with Iain Nasatir regarding memo on insurance (.2).	0.50	675.00	\$337.50
01/13/2021	JIS	GC	Call with C. Paez re committee agenda.	0.30	675.00	\$202.50
01/13/2021	JIS	GC	Attend committee meeting.	0.60	675.00	\$405.00
01/13/2021	IDS	GC	Attend SCC meeting regarding mediation. Attend committee meeting regarding insurance analysis.	1.00	675.00	\$675.00
01/13/2021	IDS	GC	Attend committee call regarding mediation.	0.60	675.00	\$405.00
01/15/2021	JIS	GC	Call with State Court Counsel regarding the allocation system and call with Malott.	1.10	675.00	\$742.50
01/17/2021	JIS	GC	Call with Committee regarding settlement steps.	0.20	675.00	\$135.00
01/19/2021	JIS	GC	Committee call regarding bar date, IAC, discovery.	1.00	675.00	\$675.00
01/20/2021	IDS	GC	Telephone call with Committee regarding mediation demand.	1.00	675.00	\$675.00
01/22/2021	IDS	GC	Attend all SCC call regarding mediation demand.	1.00	675.00	\$675.00
01/27/2021	IDS	GC	Attend committee meeting regarding litigation, mediation.	1.00	675.00	\$675.00
01/29/2021	IDS	GC	Attend SCC call regarding mediation.	1.00	675.00	\$675.00
				<b>13.30</b>		<b>\$8,977.50</b>

### Hearing

01/26/2021	IDS	HE	Review Debtor's response to NDH.	0.40	675.00	\$270.00
01/26/2021	IDS	HE	Attend telephonic hearing regarding case motions.	2.00	675.00	\$1,350.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/26/2021	IDS	HE	Telephone call with James Stang, Kenneth Brown regarding case status hearing.	0.20	675.00	\$135.00
				<b>2.60</b>		<b>\$1,755.00</b>

### Insurance Coverage

01/04/2021	IAWN	IC	Review Stang and SCC emails re telephone call tomorrow	0.10	675.00	\$67.50
01/04/2021	IAWN	IC	Review Elaesser email re insurance information	0.10	675.00	\$67.50
01/05/2021	IAWN	IC	Review and analyze Linnenburger email re issues and actions	0.30	675.00	\$202.50
01/05/2021	IAWN	IC	SCC call re settlement strategy	0.50	675.00	\$337.50
01/05/2021	IAWN	IC	Send email to Scharf and stang re Linnenburger email	0.10	675.00	\$67.50
01/05/2021	IAWN	IC	Review Scharf and Stang estimates for settlement	0.10	675.00	\$67.50
01/06/2021	IAWN	IC	Telephone conference with James I Stang and Ilan Scharf re hall mediation approach	0.10	675.00	\$67.50
01/06/2021	IAWN	IC	Telephone conference with James I Stang and SCC re demand in mediation	0.80	675.00	\$540.00
01/06/2021	IAWN	IC	Attend TCC meeting re strategy	1.00	675.00	\$675.00
01/06/2021	IAWN	IC	Telephone conference with James I Stang re TCC meeting	0.10	675.00	\$67.50
01/06/2021	IAWN	IC	Review Hall email draft to Elaesser	0.10	675.00	\$67.50
01/06/2021	IAWN	IC	Review Stang email to TCC re settlement offer	0.10	675.00	\$67.50
01/07/2021	IAWN	IC	Review James I Stang letter to Elaesser re actions to be taken	0.10	675.00	\$67.50
01/08/2021	IAWN	IC	Review Ford 10th Circuit cases re SOL/notice	0.80	675.00	\$540.00
01/08/2021	IAWN	IC	Review ADSF charts and analyze	2.30	675.00	\$1,552.50
01/08/2021	IAWN	IC	Review Elaesser email re contact with insurers	0.10	675.00	\$67.50
01/08/2021	IAWN	IC	Draft email to James I Stang re new information from Elaessar	0.20	675.00	\$135.00
01/08/2021	IAWN	IC	Review James I Stang request for status report insert re insurance	0.10	675.00	\$67.50
01/09/2021	IAWN	IC	Review pleadings re file room re insurance references	1.50	675.00	\$1,012.50
01/09/2021	IAWN	IC	Draft summary of insurance situation for James I tang for status report	0.30	675.00	\$202.50
01/09/2021	IAWN	IC	Exchange emails with James I Stang re summary, .1;	0.30	675.00	\$202.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			revise same, .2			
01/11/2021	IAWN	IC	Telephone conference with James I Stang re recent information from debtor	0.10	675.00	\$67.50
01/11/2021	IAWN	IC	Exchange emails with Ford re timing for call	0.10	675.00	\$67.50
01/11/2021	JIS	IC	Call Iain Nasatir regarding insurance information provided by Debtor.	0.10	675.00	\$67.50
01/11/2021	JIS	IC	Call Iain Nasatir regarding follow up to insurance info provided by Debtor.	0.10	675.00	\$67.50
01/12/2021	IAWN	IC	Exchange emails with Janice G Washington and IT re percentage calculations	0.20	675.00	\$135.00
01/12/2021	IAWN	IC	Review emails with SCC re timing for call	0.10	675.00	\$67.50
01/12/2021	IAWN	IC	Review Linnenburger email re strategy	0.10	675.00	\$67.50
01/12/2021	IAWN	IC	Review Elaesser response re carriers	0.10	675.00	\$67.50
01/12/2021	IAWN	IC	Review Ilan Scharf, Smith and Linnenburger emails re another mediator	0.20	675.00	\$135.00
01/12/2021	IAWN	IC	Review and analyze Monagle memo re settlement ratios	0.80	675.00	\$540.00
01/12/2021	IAWN	IC	Review Ilan Scharf email re Monagle memo	0.10	675.00	\$67.50
01/13/2021	IAWN	IC	Draft and send comments on Monagle memo to Ilan Scharf and James I Stang	0.20	675.00	\$135.00
01/13/2021	IAWN	IC	Review CM exposure letter	0.10	675.00	\$67.50
01/13/2021	IAWN	IC	Exchange emails with Peter Geip and Monagle re excel numbers	0.10	675.00	\$67.50
01/13/2021	IAWN	IC	Analyze Monagle memo against chart and evaluate	1.00	675.00	\$675.00
01/13/2021	IAWN	IC	Telephone conference with James I Stang re chart	0.20	675.00	\$135.00
01/13/2021	IAWN	IC	Telephone conference with SCC re coverage and settlement	1.00	675.00	\$675.00
01/13/2021	IAWN	IC	Telephone conference with James I Stang re SCC call	0.20	675.00	\$135.00
01/14/2021	IAWN	IC	Exchange emails with Ford, Murray etc, re changing meeting time	0.20	675.00	\$135.00
01/15/2021	IAWN	IC	Exchange emails re telephone call	0.10	675.00	\$67.50
01/15/2021	IAWN	IC	Prepare for call with Elaessar re chart	0.10	675.00	\$67.50
01/15/2021	IAWN	IC	Telephone conference with Murray and Eaesser re chart and insurance issues	1.10	675.00	\$742.50
01/15/2021	IAWN	IC	Telephone conference with James I Stang re Elaesser call	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/15/2021	IAWN	IC	Telephone conference with Malott re mediation strategy	1.50	675.00	\$1,012.50
01/15/2021	JIS	IC	Call with Debtor regarding insurance coverage issues.	0.50	675.00	\$337.50
01/15/2021	JIS	IC	Call with Lisa F. and B.Hall regarding insurance coverage issues.	0.60	675.00	\$405.00
01/18/2021	IAWN	IC	Exchange emails with James I Stang re insurance insert in status report, .1, revise insurance section, .2, review emails from stang to SCC re same, .1	0.40	675.00	\$270.00
01/19/2021	IAWN	IC	Telephone conference with mediator and TCC re ADSF offer p/o call	1.10	675.00	\$742.50
01/21/2021	IAWN	IC	Review demand letter, .1 review pre 77 settlement and analyze re scope of settlement, .8, email to Ford and Hall re scope of settlement, 1.	1.00	675.00	\$675.00
01/22/2021	IAWN	IC	Exchange emails with Hall and Ford re scope of settlement, .2, review Linnenberger email re demand strategy, .2, review demand letter, .1	0.50	675.00	\$337.50
01/25/2021	IAWN	IC	Telephone conference with James I Stang re ADSF statement to court;.2; review statement to court, .1	0.30	675.00	\$202.50
01/26/2021	IAWN	IC	Attend p/o status conference 1.3; review emails between Elaesser and James I Stang re insurers, .1; review mediator email, .1	1.50	675.00	\$1,012.50
				<b>23.00</b>		<b>\$15,525.00</b>

### Mediation

01/05/2021	JIS	ME	State Court Counsel call re mediation strategy.	1.50	675.00	\$1,012.50
01/06/2021	IDS	ME	Attend call with SCC regarding mediation.	0.30	675.00	\$202.50
01/06/2021	IDS	ME	Telephone call with IAWN, James Stang regarding demand.	0.20	675.00	\$135.00
01/06/2021	IDS	ME	Attend Committee call regarding mediation case status.	1.00	675.00	\$675.00
01/12/2021	IDS	ME	Review correspondence from SCC regarding mediator.	0.20	675.00	\$135.00
01/12/2021	IDS	ME	Review L. Monagle analysis regarding mediation.	0.40	675.00	\$270.00
01/12/2021	IDS	ME	Review correspondence from Ford regarding mediation.	0.30	675.00	\$202.50
01/13/2021	JIS	ME	Attend state court counsel call regarding insurance memorandum.	1.10	675.00	\$742.50
01/13/2021	JIS	ME	Call Iain Nasatir following state court counsel re	0.20	675.00	\$135.00



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			mediation.			
01/13/2021	IDS	ME	Telephone conference with Jim Stang regarding mediation demand.	0.30	675.00	\$202.50
01/15/2021	JIS	ME	Review and send emails to mediator regarding offers and counteroffers.	0.10	675.00	\$67.50
01/15/2021	JIS	ME	Meeting with mediator regarding case status.	1.70	675.00	\$1,147.50
01/18/2021	JIS	ME	Call B. Hall regarding mediation issues.	0.40	675.00	\$270.00
01/18/2021	JIS	ME	Update communications to mediator re issues (,2); call with Ilan Scharf re same (,3).	0.50	675.00	\$337.50
01/18/2021	JIS	ME	Call Dan Fasy re mediation status.	0.20	675.00	\$135.00
01/19/2021	JIS	ME	Call with Committee and mediator.	1.50	675.00	\$1,012.50
01/19/2021	JIS	ME	Call with mediator re upcoming meeting with Committee.	0.20	675.00	\$135.00
01/20/2021	IDS	ME	Telephone call with James Stang regarding offer/ mediation.	0.20	675.00	\$135.00
01/21/2021	IDS	ME	Draft demand letter to Diocese.	0.30	675.00	\$202.50
01/21/2021	IDS	ME	Revise demand letter.	0.20	675.00	\$135.00
01/22/2021	IDS	ME	Revise demand letter to Debtor.	0.40	675.00	\$270.00
01/22/2021	IDS	ME	Email to SCC regarding demand letter.	0.30	675.00	\$202.50
01/22/2021	IDS	ME	Further revision to demand letter.	0.30	675.00	\$202.50
				<b>11.80</b>		<b>\$7,965.00</b>

**Plan & Disclosure Stmt. [B320]**

01/06/2021	JIS	PD	Conference call with state court counsel re response to Debtor's counteroffer.	0.70	675.00	\$472.50
01/07/2021	JIS	PD	Draft email to Debtor regarding insurance analysis and offer.	0.30	675.00	\$202.50
				<b>1.00</b>		<b>\$675.00</b>

**TOTAL SERVICES FOR THIS MATTER:**

**\$183,875.00**

---

**Expenses**

12/15/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	43.42
12/16/2020	CC	Conference Call [E105] Loop Up Conference Call, JIS	93.64
01/04/2021	LN	05066.00002 Lexis Charges for 01-04-21	18.42
01/05/2021	CC	Conference Call [E105] AT&T Conference Call, KHB	1.50
01/05/2021	LN	05066.00002 Lexis Charges for 01-05-21	27.63
01/05/2021	LN	05066.00002 Lexis Charges for 01-05-21	79.59
01/05/2021	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60
01/05/2021	RE2	SCAN/COPY ( 54 @0.10 PER PG)	5.40
01/05/2021	RE2	SCAN/COPY ( 20 @0.10 PER PG)	2.00
01/05/2021	RE2	SCAN/COPY ( 22 @0.10 PER PG)	2.20
01/05/2021	RE2	SCAN/COPY ( 3 @0.10 PER PG)	0.30
01/05/2021	RE2	SCAN/COPY ( 54 @0.10 PER PG)	5.40
01/05/2021	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
01/05/2021	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
01/05/2021	RE2	SCAN/COPY ( 28 @0.10 PER PG)	2.80
01/05/2021	RE2	SCAN/COPY ( 22 @0.10 PER PG)	2.20
01/05/2021	RE2	SCAN/COPY ( 54 @0.10 PER PG)	5.40

---

01/05/2021	RE2	SCAN/COPY ( 19 @0.10 PER PG)	1.90
01/05/2021	RE2	SCAN/COPY ( 28 @0.10 PER PG)	2.80
01/05/2021	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60
01/05/2021	RE2	SCAN/COPY ( 57 @0.10 PER PG)	5.70
01/05/2021	RE2	SCAN/COPY ( 57 @0.10 PER PG)	5.70
01/06/2021	BB	05066.00002 Bloomberg Charges for 01-06-21	60.00
01/06/2021	CC	Conference Call [E105] Loop Up Conference Call, JIS	96.23
01/06/2021	LN	05066.00002 Lexis Charges for 01-06-21	9.21
01/06/2021	LN	05066.00002 Lexis Charges for 01-06-21	8.85
01/08/2021	LN	05066.00002 Lexis Charges for 01-08-21	27.64
01/11/2021	LN	05066.00002 Lexis Charges for 01-11-21	18.42
01/12/2021	LN	05066.00002 Lexis Charges for 01-12-21	9.21
01/13/2021	CC	Conference Call [E105] Loop Up Conference Call, JIS	55.23
01/14/2021	RE2	SCAN/COPY ( 32 @0.10 PER PG)	3.20
01/14/2021	RE2	SCAN/COPY ( 29 @0.10 PER PG)	2.90
01/14/2021	RE2	SCAN/COPY ( 18 @0.10 PER PG)	1.80
01/14/2021	RE2	SCAN/COPY ( 33 @0.10 PER PG)	3.30
01/14/2021	RE2	SCAN/COPY ( 30 @0.10 PER PG)	3.00

---

01/14/2021	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
01/14/2021	RE2	SCAN/COPY ( 51 @0.10 PER PG)	5.10
01/15/2021	LN	05066.00002 Lexis Charges for 01-15-21	101.01
01/17/2021	CC	Conference Call [E105] Loop Up Conference Call, JIS	51.70
01/19/2021	CC	Conference Call [E105] Loop Up Conference Call, JIS	160.48
01/20/2021	CC	Conference Call [E105] Loop Up Conference Call, JIS	92.50
01/21/2021	CC	Conference Call [E105] AT&T Conference Call, KHB	5.11
01/26/2021	RE2	SCAN/COPY ( 20 @0.10 PER PG)	2.00
01/26/2021	RE2	SCAN/COPY ( 11 @0.10 PER PG)	1.10
01/26/2021	RE2	SCAN/COPY ( 5 @0.10 PER PG)	0.50
01/27/2021	RE2	SCAN/COPY ( 22 @0.10 PER PG)	2.20
01/27/2021	RE2	SCAN/COPY ( 19 @0.10 PER PG)	1.90
01/27/2021	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60
01/27/2021	RE2	SCAN/COPY ( 16 @0.10 PER PG)	1.60
01/27/2021	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
01/27/2021	RE2	SCAN/COPY ( 6 @0.10 PER PG)	0.60
01/27/2021	RE2	SCAN/COPY ( 20 @0.10 PER PG)	2.00
01/29/2021	BB	05066.00002 Bloomberg Charges for 01-29-21	402.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 21  
Invoice 127999  
January 31, 2021

---

01/31/2021	OS	Everlaw, Inv. 35065, Database for month of January	500.00
------------	----	--	--------

01/31/2021	PAC	Pacer - Court Research	73.90
------------	-----	------------------------	-------

**Total Expenses for this Matter**

**\$2,017.29**

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 01/31/2021**

**Total Fees \$183,875.00**

**Total Expenses 2,017.29**

**Total Due on Current Invoice \$185,892.29**

**Outstanding Balance from prior invoices as of 01/31/2021 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

---

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$17,854.87
126833	09/30/2020	\$7,512.50	\$567.41	\$1,878.12
126904	10/31/2020	\$89,325.00	\$2,234.47	\$22,331.25
126905	11/30/2020	\$86,197.50	\$641.07	\$21,549.37
126906	12/31/2020	\$151,132.50	\$506.90	\$37,783.12

**Total Amount Due on Current and Prior Invoices: \$633,464.66**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

February 28, 2021

Invoice 128001

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 02/28/2021**

FEES	\$123,550.00
EXPENSES	\$1,724.62
<b>TOTAL CURRENT CHARGES</b>	<b>\$125,274.62</b>
<b>BALANCE FORWARD</b>	<b>\$633,464.66</b>
<b>TOTAL BALANCE DUE</b>	<b>\$758,739.28</b>



---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	63.70	\$42,997.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	24.50	\$16,537.50
IDS	Scharf, Ilan D.	Partner	675.00	3.10	\$2,092.50
JIS	Stang, James I.	Partner	675.00	15.20	\$10,260.00
KHB	Brown, Kenneth H.	Partner	675.00	61.60	\$41,580.00
LAF	Forrester, Leslie A.	Other	475.00	4.60	\$2,185.00
RMS	Saunders, Robert M.	Counsel	675.00	11.70	\$7,897.50
				<hr/> 184.40	<hr/> \$123,550.00

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.40	\$270.00
AD	Asset Disposition [B130]	0.60	\$405.00
AP	Appeals [B430]	3.80	\$2,505.00
BL	Bankruptcy Litigation [L430]	125.30	\$84,117.50
GC	General Creditors Comm. [B150]	6.90	\$4,657.50
IC	Insurance Coverage	43.20	\$28,760.00
ME	Mediation	3.70	\$2,497.50
PD	Plan & Disclosure Stmt. [B320]	0.50	\$337.50
		184.40	<hr/> \$123,550.00

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 128001  
February 28, 2021

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Bloomberg	\$562.50
Lexis/Nexis- Legal Research [E	\$620.52
Outside Services	\$500.00
Pacer - Court Research	\$35.00
Reproduction/ Scan Copy	\$6.60
	<hr/>
	\$1,724.62

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
02/09/2021	JIS	AA	Call regarding collectibles and other artwork values.	0.40	675.00	\$270.00
				<b>0.40</b>		<b>\$270.00</b>
<b>Asset Disposition [B130]</b>						
02/01/2021	IDS	AD	Review motion to sell property in Raton, NM.	0.60	675.00	\$405.00
				<b>0.60</b>		<b>\$405.00</b>
<b>Appeals [B430]</b>						
02/04/2021	JIS	AP	Review orders regarding stay pending appeal and email to committee re same.	0.20	675.00	\$135.00
02/09/2021	GSG	AP	Review case and article standing issues on appeal and aggrieved person standard.	0.20	675.00	\$135.00
02/10/2021	KHB	AP	Review Parish reply to opposition to motion for direct appeal and new authorities relied upon.	1.30	675.00	\$877.50
02/10/2021	GSG	AP	Review reply brief re direct certification under 158(d).	0.40	675.00	\$270.00
02/11/2021	LAF	AP	Locate petition for cert in Scholz v Presbytery.	0.30	475.00	\$142.50
02/11/2021	GSG	AP	Review additional cases cited by Parishes re direct certification and church autonomy.	0.90	675.00	\$607.50
02/19/2021	JIS	AP	Call Ken Brown regarding 10th Cir. BAP decision.	0.10	675.00	\$67.50
02/19/2021	JIS	AP	Review BAP opinion regarding 10th Circuit certification.	0.10	675.00	\$67.50
02/19/2021	GSG	AP	Review BAP Order; emails re same.	0.30	675.00	\$202.50
				<b>3.80</b>		<b>\$2,505.00</b>
<b>Bankruptcy Litigation [L430]</b>						
02/01/2021	KHB	BL	Review Bloomberg report on ASF asset protection scheme re potential witnesses.	0.80	675.00	\$540.00
02/01/2021	GSG	BL	Research/review cases re NMSA, trusts, and church property disputes.	2.10	675.00	\$1,417.50
02/01/2021	GSG	BL	Revise MSJ to eliminate association termination arguments.	0.60	675.00	\$405.00
02/01/2021	GSG	BL	Blackline and circulate MSJ with comments to K. Brown.	0.50	675.00	\$337.50
02/01/2021	GSG	BL	Review articles are abuse cases and shielding property of the estate.	0.50	675.00	\$337.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/04/2021	KHB	BL	Review scheduling orders and opinion denying motion for stay pending appeal (.5); emails with G. Greenwood and J. Stang re same (.2); emails to/from Committee members re same (.2); confer with J. Stang re same and re timing of SJMs (.2).	1.10	675.00	\$742.50
02/04/2021	GSG	BL	Review article re asset protection among dioceses.	0.30	675.00	\$202.50
02/04/2021	GSG	BL	Review opinion and orders re denial of stay pending appeal.	0.30	675.00	\$202.50
02/09/2021	KHB	BL	Work on SJM re Religious Freedom Affirmative defenses.	4.80	675.00	\$3,240.00
02/10/2021	JIS	BL	Call Ken Brown regarding status of property litigation and committee call re same.	0.30	675.00	\$202.50
02/10/2021	KHB	BL	Work on summary judgment motion relating to Religious Liberty Defenses and analyze authorities re same (4.8); work on stipulation re filing summary judgment motions in one case applicable to all three (.7); confer with J. Stang re litigation status and strategy in preparation for committee call (.3).	5.80	675.00	\$3,915.00
02/10/2021	GSG	BL	Draft stipulation re summary judgment motions.	1.90	675.00	\$1,282.50
02/10/2021	GSG	BL	Emails to/from K. Brown re summary judgment motions and comments.	0.20	675.00	\$135.00
02/10/2021	GSG	BL	Revise and blackline stipulation re summary judgment motions to include citations to affirmative defenses.	0.90	675.00	\$607.50
02/11/2021	KHB	BL	Work on summary judgment motion re religious liberty defenses.	5.50	675.00	\$3,712.50
02/11/2021	GSG	BL	Review article re diocese transfers and responses.	0.20	675.00	\$135.00
02/12/2021	KHB	BL	Work on summary judgment motion re religious liberty defenses.	9.00	675.00	\$6,075.00
02/12/2021	GSG	BL	Emails to/from K. Brown re MSJs; review notes re First Amendment analysis.	0.30	675.00	\$202.50
02/15/2021	KHB	BL	Work on SJM re religious liberty defenses and analyze authorities re same (4.6); confer with J. Stang re same (.2); work on SJM re application of NM unincorporated assn statute (1.2).	6.00	675.00	\$4,050.00
02/15/2021	GSG	BL	Review K. Brown comments re MSJ and identify follow-up issues; review answers and declarations are admission of fact and revise motion re same; shepardize cases and review cases cited by court opinion.	3.60	675.00	\$2,430.00
02/16/2021	JIS	BL	Call M. Hamilton re review of motions for summary judgments on religious freedom issues.	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/16/2021	JIS	BL	Call Ken Brown regarding motions for summary judgments on religious freedom and parish statute compliance.	0.40	675.00	\$270.00
02/16/2021	KHB	BL	Work on summary judgement motion re unincorporated parishes issue and analyze authorities re same (4.5); confer with J. Stang re same and re SJM on religious liberty issues (.3); confer with G. Greenwood re same (.2).	5.00	675.00	\$3,375.00
02/16/2021	GSG	BL	Review Portland/Spokane cases re church property disputes and defenses.	0.70	675.00	\$472.50
02/16/2021	GSG	BL	Review and email stipulation re MSJ briefing and email to defense counsel.	0.30	675.00	\$202.50
02/16/2021	GSG	BL	Confer with K. Brown re briefing timing and further research.	0.10	675.00	\$67.50
02/16/2021	GSG	BL	Draft/revise MSJ re religious liberty defenses.	6.30	675.00	\$4,252.50
02/17/2021	KHB	BL	Work on motion for partial summary judgment re parishes inability to be trust beneficiaries and analyze authorities re same.	5.20	675.00	\$3,510.00
02/17/2021	LAF	BL	Legal research re: Unincorporated associations as trust beneficiaries.	1.00	475.00	\$475.00
02/17/2021	GSG	BL	Revise/draft summary judgment re Religious Liberty Defenses.	5.30	675.00	\$3,577.50
02/18/2021	JIS	BL	Call Ken Brown regarding motions for summary judgment.	0.20	675.00	\$135.00
02/18/2021	KHB	BL	Work on summary judgment motions and analyze authorities re same (5.3); confer with J. Stang re summary judgment motions (.1).	5.40	675.00	\$3,645.00
02/18/2021	LAF	BL	Legal research re: Unincorporated associations as trust beneficiaries.	0.30	475.00	\$142.50
02/18/2021	GSG	BL	Review opinion authorities and MSJ brief re final comments to/from K. Brown; blackline and circulate.	1.20	675.00	\$810.00
02/18/2021	GSG	BL	Review email re stipulation re MSJ briefing.	0.10	675.00	\$67.50
02/18/2021	GSG	BL	Research history of resulting trusts, cases, and beneficiary capacity; review cases and prepare notes re same.	4.80	675.00	\$3,240.00
02/19/2021	JIS	BL	Call Ken Brown regarding motion for summary judgment regarding parish incorporation.	0.10	675.00	\$67.50
02/19/2021	JIS	BL	Review motion for summary judgment regarding parish incorporation (.7); partial review of motion summary judgment for religious liberty defenses	1.30	675.00	\$877.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			(.6).			
02/19/2021	KHB	BL	Review Debtor's response to settlement offer (.2); confer with J. Stang re same (.1); work on motion for summary judgment re unincorporated associations (4.7).	5.00	675.00	\$3,375.00
02/19/2021	LAF	BL	Legal research re: Unincorporated associations & trusts.	0.50	475.00	\$237.50
02/19/2021	GSG	BL	Research re unincorporated associations and trusts (1.4); research re exceptions to legal capacity based on membership/ascertainable beneficiary and charitable trust doctrine (3.7).	5.10	675.00	\$3,442.50
02/19/2021	GSG	BL	Review emails re current status of appeals and MSJ scheduling.	0.10	675.00	\$67.50
02/22/2021	KHB	BL	Confer with G. Greenwood re summary judgment on unincorporated association issues (.2); emails to counsel for Parishes and ASF re proposed stipulation re summary judgment motions and review authority re consolidation (.4).	0.60	675.00	\$405.00
02/22/2021	GSG	BL	Confer with K. Brown re MSJ stipulation and status of motion re trust beneficiary capacity.	0.20	675.00	\$135.00
02/23/2021	LAF	BL	Legal research re: Scott on Trusts; unincorporated associations.	0.50	475.00	\$237.50
02/23/2021	GSG	BL	Review K. Brown comments re MSJ on trust beneficiaries; review spreadsheets re available facts on transfers.	0.90	675.00	\$607.50
02/23/2021	GSG	BL	Review L. Forrester materials and identify relevant treatise sections for trust research.	0.60	675.00	\$405.00
02/23/2021	GSG	BL	Research/review cases cited by defendants re common law trust arguments and trust beneficiaries; notes re same.	5.30	675.00	\$3,577.50
02/24/2021	KHB	BL	Emails with R. Charles re stipulation for consolidation.	0.10	675.00	\$67.50
02/24/2021	GSG	BL	Follow-up research re merger doctrine and trusts.	1.10	675.00	\$742.50
02/24/2021	GSG	BL	Revise MSJ re trust beneficiaries based on K. Brown comments and additional facts.	3.60	675.00	\$2,430.00
02/25/2021	KHB	BL	Work on summary judgment motion on religious liberty defenses and analyze authorities re same.	4.30	675.00	\$2,902.50
02/25/2021	GSG	BL	Review current decisions re spendthrift trust and 10 year SL.	0.20	675.00	\$135.00
02/25/2021	GSG	BL	Review/research cases cited by Court re resulting and constructive trusts.	2.50	675.00	\$1,687.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/25/2021	GSG	BL	Emails re conference call and follow-up re religious liberty defenses.	0.10	675.00	\$67.50
02/25/2021	GSG	BL	Revise MSJ re trust beneficiaries; outline additional argument re exceptions to common law rule.	4.90	675.00	\$3,307.50
02/26/2021	GSG	BL	Research/review Scott on Trusts; emails to/from L. Forrester re same.	1.30	675.00	\$877.50
02/26/2021	GSG	BL	Revise MSJ re trust beneficiary status.	4.60	675.00	\$3,105.00
02/28/2021	GSG	BL	Further research re common law exceptions to unincorporated associations as legal entities capable of receiving property in trust.	1.20	675.00	\$810.00
				<b>125.30</b>		<b>\$84,117.50</b>

#### General Creditors Comm. [B150]

02/05/2021	JIS	GC	State court counsel call re status of litigation and mediation.	0.30	675.00	\$202.50
02/05/2021	JIS	GC	Call with media regarding status of appeal and adversary proceedings.	0.30	675.00	\$202.50
02/08/2021	JIS	GC	Call B. Hall regarding issues related to case.	0.40	675.00	\$270.00
02/10/2021	JIS	GC	Committee meeting regarding Debtor's counteroffer.	1.70	675.00	\$1,147.50
02/10/2021	KHB	GC	Call with committee re settlement and litigation strategy.	1.70	675.00	\$1,147.50
02/17/2021	JIS	GC	Call with F. Elsaesser regarding settlement offer and in camera hearing.	0.80	675.00	\$540.00
02/18/2021	JIS	GC	Call C. Montoya regarding postconfirmation issues.	0.80	675.00	\$540.00
02/24/2021	JIS	GC	Attend OCC meeting regarding status of offer and in camera hearing.	0.40	675.00	\$270.00
02/24/2021	IDS	GC	Attend Committee call.	0.50	675.00	\$337.50
				<b>6.90</b>		<b>\$4,657.50</b>

#### Insurance Coverage

02/01/2021	IAWN	IC	Review SCC emails re real estate, .1, review Elaesser Stang emails re settlement deadline, .1	0.20	675.00	\$135.00
02/03/2021	IAWN	IC	EReview Elaesser email re in camera hearing	0.10	675.00	\$67.50
02/08/2021	IAWN	IC	Review Elaesser letter re offer	0.10	675.00	\$67.50
02/09/2021	IAWN	IC	Telephone conference w/ SCC re insurance issues, 1.0; telephone call with James I Stang re call with SCC telephone call, .1; telephone call w/ Lisa Ford re insurance, .2	1.30	675.00	\$877.50



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/09/2021	IAWN	IC	Review file re claim counts v.v. insurer, .4, resend email re claim demand strategy to James I Stang, .1	0.50	675.00	\$337.50
02/11/2021	IAWN	IC	Review emails between James I Stang and SCC re settlement letter draft	0.10	675.00	\$67.50
02/11/2021	IAWN	IC	Review draft stipulation,.1, exchange emails with Anderson re stipulation, .1	0.20	675.00	\$135.00
02/12/2021	IAWN	IC	Review James I Stang settlement letter and SCC comments	0.20	675.00	\$135.00
02/12/2021	IAWN	IC	Review Anderson and Elaesser emails re stipulation, .1, review SCC emails re meeting on in camera hearing, .1	0.20	675.00	\$135.00
02/13/2021	IAWN	IC	Telephone conference with James I Stang re in camera hearing	0.30	675.00	\$202.50
02/13/2021	IAWN	IC	Analyze settlement agreements, coverage chart 1.3, draft brief for in camera hearing 2.2, research NM occurrence legal precedent1.2, review Travelers POC, .1, draft emails to Ford re draft .1, draft email to James I Stang re in camera issues, .1 exchange emails with Ford re brief, .1, review brief, .1	5.20	675.00	\$3,510.00
02/13/2021	IAWN	IC	Research anti-assignment under NM law re settlement agreements	1.00	675.00	\$675.00
02/13/2021	JIS	IC	Call Iain Nasatir regarding coverage issues related to the upcoming hearing.	0.30	675.00	\$202.50
02/14/2021	IAWN	IC	Review SCC emails re attendance at in camera hearing	0.10	675.00	\$67.50
02/14/2021	IAWN	IC	Review Gallup file and pull NM ruling on ASDF coverage, .4, email same to Ford, .1	0.50	675.00	\$337.50
02/15/2021	IAWN	IC	Telephone conference w/ SCC re in camera and settlements, 1.0, exchange emails with SCC re call, .1,, exchange emails with James I Stang re CM as a party to in camera, .1	1.20	675.00	\$810.00
02/15/2021	JIS	IC	State Court Counsel call regarding insurance in camera hearing.	1.20	675.00	\$810.00
02/15/2021	IDS	IC	Attend SCC call regarding chambers conference (insurance)	1.00	675.00	\$675.00
02/15/2021	IDS	IC	Review insurance decision regarding diocese policies.	1.00	675.00	\$675.00
02/16/2021	IAWN	IC	Telephone conference with James I Stang re ASDF status	0.10	675.00	\$67.50
02/16/2021	IAWN	IC	Telephone conference with Murray re insurance issues, .2; telephone conference with Elaesser and	0.90	675.00	\$607.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			James I Stang re mediation, .7, exchange emails and telephone conference with Robert Saunders re arbitration research, .1			
02/16/2021	JIS	IC	Call Iain Nasatir and Debtor regarding insurance hearing stipulation.	0.60	675.00	\$405.00
02/16/2021	JIS	IC	Call with Iain Nasatir regarding insurance issues for hearing.	0.10	675.00	\$67.50
02/16/2021	RMS	IC	Work on insurance research project	4.40	675.00	\$2,970.00
02/16/2021	RMS	IC	Telephone conference with Iain Nasatir regarding insurance research project	0.30	675.00	\$202.50
02/16/2021	RMS	IC	Email exchange with Leslie Forrester regarding insurance research project	0.10	675.00	\$67.50
02/17/2021	IAWN	IC	Telephone conference with Robert Saunders re arbitration project	0.10	675.00	\$67.50
02/17/2021	IAWN	IC	Reviewed transcript from hearing,, .8 review settlements timing, .8, draft letter to Judge Thuma, 1.4, send email to Hall, Monagle, Ford, James I Stang Ilan Scharfl outlining call with ASDFand strategy with draft of letter, .3 exchange emails with Ford re revisions to letter, .1, revise letter, .2, review SCC comments, .2, exchange emails with James I Stang re letter .1, revise letter re James I Stang, .2; exchange emails with James I Stang re meeting with SCC, .1 revise exhibits for letter, .1, telephone conference w/ SCC, .7, telephone conference with Robert Saunders re arbitration jurisdiction, .2, review Robert Saunders' materials, .2	5.10	675.00	\$3,442.50
02/17/2021	JIS	IC	Call with State Court Counsel regarding status of in camera insurance hearing.	0.40	675.00	\$270.00
02/17/2021	RMS	IC	Telephone conference with Iain Nasatir regarding insurance research project	0.20	675.00	\$135.00
02/17/2021	RMS	IC	Work on insurance research project	6.20	675.00	\$4,185.00
02/17/2021	RMS	IC	Email exchange with Leslie Forrester regarding insurance research project	0.30	675.00	\$202.50
02/17/2021	RMS	IC	Email exchange with Iain Nasatir regarding insurance research project	0.20	675.00	\$135.00
02/17/2021	LAF	IC	Legal research re: Arbitration & bankruptcy; insurance claims.	2.00	475.00	\$950.00
02/18/2021	IAWN	IC	Exchange emails with Murray re coverage chart in camera, edits, .5, review more SCC comments re letter .1, exchange emails with Janice G Washington and Sophia Lee re arranging for in camera chambers submission, .2, exchange emails with Elaesser re call	2.20	675.00	\$1,485.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			in on Monday, .1, revise letter to Judge Thuma, 1.0, review pro hac application and local rules, .3			
02/19/2021	IAWN	IC	Exchange lengthy emails with Linnenburger re letter and conclusion, .2, exchange lengthy emails with Monagle re letter approach,.2, exchange emails with Lee re pro hac, .1, finalize letter and exhibits to go to chambers, 1.5, review James I Stang emails re mediation, .2, review Walker emails re submission, .1	2.30	675.00	\$1,552.50
02/21/2021	IAWN	IC	Telephone conference with James I Stang re in camera hearing	0.30	675.00	\$202.50
02/21/2021	JIS	IC	Call Iain Nasatir re in camera hearing on insurance.	0.30	675.00	\$202.50
02/22/2021	IAWN	IC	Prep for in camera hearing, .5, attend in camera hearing, 1.4, telephone conference with James I Stang re hearing, .1, review De La Cruz and Linnenburger emails re severity scale, .1, exchange emails with Murray re severity chart, .1, exchange emails with Ford, re arbitrations, .1	2.30	675.00	\$1,552.50
02/22/2021	JIS	IC	Call F. Elsaesser regarding in camera hearing.	0.10	675.00	\$67.50
				<b>43.20</b>		<b>\$28,760.00</b>

### Mediation

02/01/2021	JIS	ME	Draft email to counsel and committee re extension of offer deadline.	0.10	675.00	\$67.50
02/05/2021	JIS	ME	Call mediator re status of discussions with Debtor.	0.30	675.00	\$202.50
02/08/2021	JIS	ME	Call Ilan Scharf regarding Debtor's counteroffer.	0.20	675.00	\$135.00
02/08/2021	JIS	ME	Review Debtor's rejection of counteroffer and forward to committee.	0.10	675.00	\$67.50
02/09/2021	JIS	ME	Meeting with State Court Counsel regarding response to Debtor's rejection of offer.	1.10	675.00	\$742.50
02/11/2021	JIS	ME	Draft settlement letter to ADSF.	1.40	675.00	\$945.00
02/12/2021	JIS	ME	Call with State Court Counsel regarding response to Debtor's counteroffer.	0.50	675.00	\$337.50
				<b>3.70</b>		<b>\$2,497.50</b>

### Plan & Disclosure Stmt. [B320]

02/19/2021	JIS	PD	State court counsel call regarding ADSF response to offer.	0.20	675.00	\$135.00
02/19/2021	JIS	PD	Review Debtor's response to counteroffer.	0.30	675.00	\$202.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 13  
Invoice 128001  
February 28, 2021

---

**0.50**

---

**\$337.50**

**TOTAL SERVICES FOR THIS MATTER:**

**\$123,550.00**

---

**Expenses**

02/01/2021	LN	05066.00002 Lexis Charges for 02-01-21	19.47
02/09/2021	RE2	SCAN/COPY ( 24 @0.10 PER PG)	2.40
02/10/2021	LN	05066.00002 Lexis Charges for 02-10-21	39.34
02/10/2021	LN	05066.00002 Lexis Charges for 02-10-21	5.21
02/11/2021	LN	05066.00002 Lexis Charges for 02-11-21	9.83
02/11/2021	LN	05066.00002 Lexis Charges for 02-11-21	5.21
02/15/2021	LN	05066.00002 Lexis Charges for 02-15-21	9.73
02/16/2021	LN	05066.00002 Lexis Charges for 02-16-21	10.47
02/16/2021	RE2	SCAN/COPY ( 13 @0.10 PER PG)	1.30
02/17/2021	BB	05066.00002 Bloomberg Charges through 02-17-21	562.50
02/17/2021	LN	05066.00002 Lexis Charges for 02-17-21	29.20
02/17/2021	LN	05066.00002 Lexis Charges for 02-17-21	5.21
02/17/2021	LN	05066.00002 Lexis Charges for 02-17-21	126.55
02/17/2021	LN	05066.00002 Lexis Charges for 02-17-21	67.75
02/17/2021	LN	05066.00002 Lexis Charges for 02-17-21	72.56
02/17/2021	LN	05066.00002 Lexis Charges for 02-17-21	29.84
02/18/2021	RE2	SCAN/COPY ( 14 @0.10 PER PG)	1.40

---

02/18/2021	RE2	SCAN/COPY ( 15 @0.10 PER PG)	1.50
02/19/2021	LN	05066.00002 Lexis Charges for 02-19-21	19.47
02/23/2021	LN	05066.00002 Lexis Charges for 02-23-21	116.82
02/25/2021	LN	05066.00002 Lexis Charges for 02-25-21	9.73
02/25/2021	LN	05066.00002 Lexis Charges for 02-25-21	5.21
02/25/2021	LN	05066.00002 Lexis Charges for 02-25-21	9.73
02/25/2021	LN	05066.00002 Lexis Charges for 02-25-21	9.73
02/25/2021	LN	05066.00002 Lexis Charges for 02-25-21	9.73
02/26/2021	LN	05066.00002 Lexis Charges for 02-26-21	9.73
02/28/2021	LN	05066.00002 Lexis Charges for 02-28-21	9.73
02/28/2021	OS	Everlaw, Inv. 36263, AD Santa Fe Databse for the month of February	500.00
02/28/2021	PAC	Pacer - Court Research	35.00
<b>Total Expenses for this Matter</b>			<b>\$1,724.62</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 02/28/2021**

**Total Fees \$123,550.00**

**Total Expenses 1,724.62**

**Total Due on Current Invoice \$125,274.62**

**Outstanding Balance from prior invoices as of 02/28/2021 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

---

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$17,854.87
126833	09/30/2020	\$7,512.50	\$567.41	\$1,878.12
126904	10/31/2020	\$89,325.00	\$2,234.47	\$22,331.25
126905	11/30/2020	\$86,197.50	\$641.07	\$21,549.37
126906	12/31/2020	\$151,132.50	\$506.90	\$37,783.12
127999	01/31/2021	\$183,875.00	\$2,017.29	\$185,892.29

**Total Amount Due on Current and Prior Invoices: \$758,739.28**



**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

March 31, 2021

Invoice 128003

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 03/31/2021**

FEES	\$51,705.00
EXPENSES	\$722.35
<b>TOTAL CURRENT CHARGES</b>	<b>\$52,427.35</b>
<b>BALANCE FORWARD</b>	<b>\$758,739.28</b>
<b>TOTAL BALANCE DUE</b>	<b>\$811,166.63</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	38.20	\$25,785.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	6.60	\$4,455.00
IDS	Scharf, Ilan D.	Partner	675.00	5.60	\$3,780.00
JIS	Stang, James I.	Partner	675.00	8.90	\$6,007.50
KHB	Brown, Kenneth H.	Partner	675.00	17.30	\$11,677.50
				<hr/> 76.60	<hr/> \$51,705.00

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.70	\$472.50
AD	Asset Disposition [B130]	4.90	\$3,307.50
AP	Appeals [B430]	3.90	\$2,632.50
BL	Bankruptcy Litigation [L430]	52.20	\$35,235.00
CO	Claims Admin/Objections[B310]	0.10	\$67.50
GC	General Creditors Comm. [B150]	4.60	\$3,105.00
H	Hearings	0.30	\$202.50
IC	Insurance Coverage	6.50	\$4,387.50
ME	Mediation	2.20	\$1,485.00
PD	Plan & Disclosure Stmt. [B320]	0.80	\$540.00
SL	Stay Litigation [B140]	0.40	\$270.00
		76.60	<hr/> \$51,705.00

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 128003  
March 31, 2021

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$1.94
Lexis/Nexis- Legal Research [E	\$171.71
Pacer - Court Research	\$48.70
Research [E106]	\$500.00
	<hr/>
	\$722.35

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis/Recovery[B120]</b>						
03/08/2021	KHB	AA	Attend continued status conference.	0.30	675.00	\$202.50
03/16/2021	KHB	AA	Email from Ford Elsaesser re real estate sales.	0.20	675.00	\$135.00
03/30/2021	KHB	AA	Review insurance settlement demands.	0.20	675.00	\$135.00
				<b>0.70</b>		<b>\$472.50</b>

<b>Asset Disposition [B130]</b>						
03/05/2021	JIS	AD	Call B. Anderson re real property sales status.	0.10	675.00	\$67.50
03/05/2021	IDS	AD	Review APA regarding IHM property (.8); email Walker regarding same (.2).	1.00	675.00	\$675.00
03/06/2021	JIS	AD	Call H. Bordwin regarding auction of real property.	0.10	675.00	\$67.50
03/15/2021	IDS	AD	Detailed review of IHM sale issues.	1.40	675.00	\$945.00
03/15/2021	IDS	AD	Work on IHM same concerns.	0.80	675.00	\$540.00
03/19/2021	JIS	AD	Call with Ilan Scharf regarding counteroffer on Immaculate Heart.	0.10	675.00	\$67.50
03/19/2021	JIS	AD	Review motions for sale of real property.	0.40	675.00	\$270.00
03/23/2021	JIS	AD	Call Ilan Scharf regarding asset sale (.2); review emails regarding competing asset sales (.2).	0.40	675.00	\$270.00
03/23/2021	IDS	AD	Email to Committee regarding IHM sale.	0.60	675.00	\$405.00
				<b>4.90</b>		<b>\$3,307.50</b>

<b>Appeals [B430]</b>						
03/10/2021	JIS	AP	Call Kenneth Brown and B. Hall regarding 10th Circuit certification.	0.20	675.00	\$135.00
03/10/2021	KHB	AP	Emails with R. Charles re stipulation concerning BAP appeal (.2); confer with J. Stang re same (.2).	0.40	675.00	\$270.00
03/11/2021	JIS	AP	Review BAP stip.	0.10	675.00	\$67.50
03/19/2021	JIS	AP	Call Ken Brown regarding BAP rejection of stipulation.	0.10	675.00	\$67.50
03/19/2021	KHB	AP	Review order denying stipulation for stay and emails with J. Stang and G. Greenwood re same (.2); confer with J. Stang re order denying stipulation for stay (.1).	0.30	675.00	\$202.50
03/22/2021	KHB	AP	Review Parish compliance certificate and email to G. Greenwood re same (.2); review notice of petition for direct appeal and email G. Greenwood re same (.2).	0.40	675.00	\$270.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/23/2021	KHB	AP	Work on stipulation for stay and emails with counsel re same (.7); review petition for direct appeal (.8); consider basis for opposition (.3); confer with G. Greenwood re same (.2).	2.00	675.00	\$1,350.00
03/24/2021	KHB	AP	Review emails re stipulation and order for stay (.2); review order (.1); confer with J. Stang re same (.1).	0.40	675.00	\$270.00
				<b>3.90</b>		<b>\$2,632.50</b>

### Bankruptcy Litigation [L430]

03/01/2021	KHB	BL	Confer with Marci Hamilton re religious liberty defenses (.3); confer with G. Greenwood re summary judgment motions (.2); review proposed stipulation re consolidation and email with G. Greenwood re same (.2); work on summary judgment motions (1.6); confer with J. Stang re same (.1).	2.40	675.00	\$1,620.00
03/01/2021	GSG	BL	Conference call with M. Hamilton and K. Brown.	0.30	675.00	\$202.50
03/01/2021	GSG	BL	Additional revisions re MSJ re trust beneficiaries; confer with M. Renck re formatting.	0.90	675.00	\$607.50
03/01/2021	GSG	BL	Review, blackline, and circulate MSJ re trust beneficiaries.	0.30	675.00	\$202.50
03/01/2021	GSG	BL	Email R. Charles re stipulation to consolidate matters for MSJ briefing.	0.10	675.00	\$67.50
03/01/2021	GSG	BL	Review church autonomy article and related issues re religious liberty defenses.	3.10	675.00	\$2,092.50
03/02/2021	GSG	BL	Confer with M. Renck re filing of MSJs and exhibits; emails re same.	0.30	675.00	\$202.50
03/02/2021	GSG	BL	Follow-up research re current Supreme Court cases and church autonomy; notes re same.	2.20	675.00	\$1,485.00
03/02/2021	GSG	BL	Revise MSJ re religious liberty defenses and church autonomy.	2.80	675.00	\$1,890.00
03/02/2021	GSG	BL	Prepare declarations (1.3) and notices (1.1) re MSJs re religious liberty defenses and trust beneficiary status.	2.40	675.00	\$1,620.00
03/03/2021	JIS	BL	Call Ken Brown and Gail Greenwood regarding status of motions for summary judgment.	0.20	675.00	\$135.00
03/03/2021	KHB	BL	Work on summary judgment motion re religious liberty defenses (2.2); confer with J. Stang and G. Greenwood re same (.2); confer with G. Greenwood re same (.2).	2.60	675.00	\$1,755.00
03/03/2021	GSG	BL	Review Restatement provisions re trust recipients;	1.70	675.00	\$1,147.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			review related cases re same.			
03/03/2021	GSG	BL	Research/review cases deciding/rejecting church autonomy issues; review 10th Circuit cases and notes re same.	2.60	675.00	\$1,755.00
03/03/2021	GSG	BL	Final revisions to MSJs, motions and declarations.	1.20	675.00	\$810.00
03/03/2021	GSG	BL	Revise exhibits to MSJ and citations re same.	0.60	675.00	\$405.00
03/03/2021	GSG	BL	Confer with K. Brown and J. Stang re motion filing (.1); prepare and circulate blacklines of motions and supporting documents (.3).	0.40	675.00	\$270.00
03/04/2021	JIS	BL	Call Ken Brown regarding summary judgment motions.	0.20	675.00	\$135.00
03/04/2021	JIS	BL	Call Ken Brown regarding summary judgment motions.	0.50	675.00	\$337.50
03/04/2021	KHB	BL	Work on summary judgment on religious liberty issues (4.9); confer with J. Stang re same (.2); confer with G. Greenwood re same (.3).	5.40	675.00	\$3,645.00
03/04/2021	GSG	BL	Review cases re ecclesiastical abstention (2.3); incorporate further comments re religious liberty motion (1.3).	3.60	675.00	\$2,430.00
03/04/2021	GSG	BL	Confer with K. Brown (.3) and revise intro re interrelationship of motions (.3).	0.60	675.00	\$405.00
03/04/2021	GSG	BL	Review cases re precedential value of appellate court opinions.	0.90	675.00	\$607.50
03/04/2021	GSG	BL	Telephone calls re status of stipulation and order re MSJ filing.	0.20	675.00	\$135.00
03/05/2021	KHB	BL	Finalize motions for summary judgment.	1.50	675.00	\$1,012.50
03/05/2021	GSG	BL	Research re appellate court as binding authority, review cases (1.1); email summary of research to K. Brown (.3).	1.40	675.00	\$945.00
03/05/2021	GSG	BL	Review, finalize, edit, and confer re filing of summary judgment motions and related documents.	2.60	675.00	\$1,755.00
03/05/2021	GSG	BL	Research re related unincorporated association statutes within 10th Circuit and cases re association status; notes re same.	2.90	675.00	\$1,957.50
03/07/2021	GSG	BL	Emails re hearing access and timing.	0.10	675.00	\$67.50
03/08/2021	GSG	BL	Attend court scheduling conference re adversary proceedings.	0.30	675.00	\$202.50
03/08/2021	GSG	BL	Research/review article re diocesan bankruptcies and religious liberty defenses; review canon law citations and cases re same.	2.20	675.00	\$1,485.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/16/2021	KHB	BL	Review recent authority re estate's ability to access trust assets.	0.80	675.00	\$540.00
03/19/2021	GSG	BL	Review BAP Order denying extension; review FRBP 8006 and docket re same.	0.20	675.00	\$135.00
03/22/2021	KHB	BL	Review recent authority on extended reach back period.	0.40	675.00	\$270.00
03/22/2021	GSG	BL	Emails to/from K. Brown re status; review docket re admission statement.	0.20	675.00	\$135.00
03/23/2021	GSG	BL	Review petition re 10th Circuit review; review FRAP and Local Rules re response deadline and calendar.	1.30	675.00	\$877.50
03/23/2021	GSG	BL	Review cases re certification issues and opposition to 10th Circuit petition.	2.60	675.00	\$1,755.00
03/24/2021	GSG	BL	Review and calendar order re 10th Circuit stay of deadlines.	0.20	675.00	\$135.00
				<b>52.20</b>		<b>\$35,235.00</b>

#### **Claims Admin/Objections[B310]**

03/03/2021	JIS	CO	Respond to email from survivor counsel regarding late filed claim.	0.10	675.00	\$67.50
				<b>0.10</b>		<b>\$67.50</b>

#### **General Creditors Comm. [B150]**

03/02/2021	JIS	GC	Call abuse survivor regarding case status.	0.10	675.00	\$67.50
03/03/2021	JIS	GC	Draft status memo to committee.	0.80	675.00	\$540.00
03/05/2021	IAWN	GC	Review debtor and other email re call timing	0.10	675.00	\$67.50
03/10/2021	JIS	GC	Prepare and draft email to committee re status.	0.60	675.00	\$405.00
03/12/2021	JIS	GC	State Court Counsel meeting re case status.	1.00	675.00	\$675.00
03/12/2021	IDS	GC	Attend SCC meeting.	1.00	675.00	\$675.00
03/15/2021	JIS	GC	Call with media re reports of settlement.	0.20	675.00	\$135.00
03/16/2021	JIS	GC	Call with State Court Counsel regarding case status.	0.50	675.00	\$337.50
03/24/2021	JIS	GC	Email to Committee re case status.	0.10	675.00	\$67.50
03/31/2021	JIS	GC	Call I. Scharf regarding summary of committee call.	0.20	675.00	\$135.00
				<b>4.60</b>		<b>\$3,105.00</b>



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Hearings</b>						
03/08/2021	JIS	H	Attend status hearing regarding pending adversary proceedings.	0.30	675.00	\$202.50
				<b>0.30</b>		<b>\$202.50</b>
<b>Insurance Coverage</b>						
03/01/2021	IAWN	IC	Telephone conference with James I Stang re Santa Fe mediation, .1, review Blumel Malott email exchange re mediation, .1	0.20	675.00	\$135.00
03/02/2021	IAWN	IC	Review Hall email re call with Malott	0.10	675.00	\$67.50
03/03/2021	IAWN	IC	Review TCC emails re mediation timing, .1, review James I Stang emails re telephone call with debtor, .1, review Elaesser email re term sheet and James I Stang response, .1	0.20	675.00	\$135.00
03/04/2021	IAWN	IC	Review emails between debtor and SCC re call re mediation, .1	0.10	675.00	\$67.50
03/08/2021	IAWN	IC	Review emails from debtor and SCC re mediation dates,	0.10	675.00	\$67.50
03/09/2021	IAWN	IC	Telephone conference w/ Murray, Elaessar, Walker, Anderson, hHall, Ford, Monagle, sScharf, re mediation, .4, tc Scharf re tc with debtor, .1; tc Lisa Ford re demands, .2	0.70	675.00	\$472.50
03/11/2021	IAWN	IC	Review emails between James I Stang and SCC re need for call and religious order timing	0.10	675.00	\$67.50
03/12/2021	IAWN	IC	Review Malott email re status	0.10	675.00	\$67.50
03/15/2021	IAWN	IC	Review Elaessar email re insurers and mediation, .1, review SCC responses re call with Malott, .1	0.20	675.00	\$135.00
03/16/2021	IAWN	IC	Review SCC emails re Malott call	0.10	675.00	\$67.50
03/18/2021	IAWN	IC	Exchange emails with Malott and SCC re telephone call	0.10	675.00	\$67.50
03/20/2021	IAWN	IC	Telephone conference w/ SCC and mediator re insurance and mediation strategy	1.30	675.00	\$877.50
03/25/2021	IAWN	IC	Review emails from SCC, Linnenberger re Malott call	0.10	675.00	\$67.50
03/26/2021	IAWN	IC	Review emails from SC, Linnenberger, re insurance strategy	0.10	675.00	\$67.50
03/29/2021	IAWN	IC	Review Elaessar email re settlement, .1, review James I Stang email to Elasser re ADSF statements in press, .1	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/29/2021	IAWN	IC	Review emails from SCC re press comments and James I Stang response	0.10	675.00	\$67.50
03/30/2021	IAWN	IC	Review draft demand letters from Mallott	1.00	675.00	\$675.00
03/31/2021	IAWN	IC	Telephone conference with James I Stang re demand, .1 exchange emails with mediator re Ilan Scharf, .1, exchange emails with SCC re insurance, .1, exchange emails with James re buyback issue, .2, exchange emails with Ford re ratios, .1, review Linnenberger and Smith emails re buyback, .1	0.70	675.00	\$472.50
03/31/2021	IAWN	IC	Telephone conference with Lisa Ford re demand strategy, .6; tc w/ TCC re status, .4	1.00	675.00	\$675.00
				<b>6.50</b>		<b>\$4,387.50</b>

### Mediation

03/03/2021	JIS	ME	Review and respond to emails regarding insurance mediation.	0.10	675.00	\$67.50
03/03/2021	IDS	ME	Review emails regarding mediation, case status.	0.40	675.00	\$270.00
03/15/2021	JIS	ME	Call with Malott, and state court counsel regarding call with mediator.	0.20	675.00	\$135.00
03/18/2021	JIS	ME	State Court Counsel call regarding mediation.	0.20	675.00	\$135.00
03/20/2021	JIS	ME	Attend Zoom call with mediator and State Court Counsel.	1.30	675.00	\$877.50
				<b>2.20</b>		<b>\$1,485.00</b>

### Plan & Disclosure Stmt. [B320]

03/01/2021	JIS	PD	Call with B. Hall re next steps in mediation.	0.20	675.00	\$135.00
03/03/2021	JIS	PD	Emails and call setting up insurance meeting.	0.20	675.00	\$135.00
03/11/2021	JIS	PD	Review emails regarding religious order issues.	0.20	675.00	\$135.00
03/11/2021	JIS	PD	Call Iain Nasatir regarding ADSF insurance issues.	0.10	675.00	\$67.50
03/29/2021	JIS	PD	Review ABQ article re settlement and email to FE re same.	0.10	675.00	\$67.50
				<b>0.80</b>		<b>\$540.00</b>

### Stay Litigation [B140]

03/31/2021	IDS	SL	Respond to inquiry regarding effect of stay on LaSalle cases.	0.40	675.00	\$270.00
				<b>0.40</b>		<b>\$270.00</b>

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 11  
Invoice 128003  
March 31, 2021

---

**TOTAL SERVICES FOR THIS MATTER:**

**\$51,705.00**

---

**Expenses**

03/01/2021	CC	Conference Call [E105] AT&T Conference Call, GSG	1.94
03/01/2021	LN	05066.00002 Lexis Charges for 03-01-21	7.06
03/01/2021	LN	05066.00002 Lexis Charges for 03-01-21	28.21
03/01/2021	LN	05066.00002 Lexis Charges for 03-01-21	26.41
03/02/2021	LN	05066.00002 Lexis Charges for 03-02-21	14.10
03/03/2021	LN	05066.00002 Lexis Charges for 03-03-21	28.21
03/03/2021	LN	05066.00002 Lexis Charges for 03-03-21	11.32
03/04/2021	LN	05066.00002 Lexis Charges for 03-04-21	28.21
03/05/2021	LN	05066.00002 Lexis Charges for 03-05-21	28.19
03/31/2021	RS	Research [E106] Everlaw, Inc. Inv. 38560	500.00
03/31/2021	PAC	Pacer - Court Research	48.70
<b>Total Expenses for this Matter</b>			<b>\$722.35</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 03/31/2021**

**Total Fees \$51,705.00**

**Total Expenses 722.35**

**Total Due on Current Invoice \$52,427.35**

**Outstanding Balance from prior invoices as of 03/31/2021 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

---

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$17,854.87
126833	09/30/2020	\$7,512.50	\$567.41	\$1,878.12
126904	10/31/2020	\$89,325.00	\$2,234.47	\$22,331.25
126905	11/30/2020	\$86,197.50	\$641.07	\$21,549.37
126906	12/31/2020	\$151,132.50	\$506.90	\$37,783.12
127999	01/31/2021	\$183,875.00	\$2,017.29	\$185,892.29
128001	02/28/2021	\$123,550.00	\$1,724.62	\$125,274.62

**Total Amount Due on Current and Prior Invoices: \$811,166.63**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

April 30, 2021

JIS

Invoice 128006

Client 05066

Matter 00002

**JIS**

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2021**

FEES \$23,482.50

EXPENSES \$647.44

**TOTAL CURRENT CHARGES** **\$24,129.94**

**BALANCE FORWARD** **\$811,166.63**

**TOTAL BALANCE DUE** **\$835,296.57**

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	3.30	\$2,227.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	16.00	\$10,800.00
IDS	Scharf, Ilan D.	Partner	675.00	3.90	\$2,632.50
JIS	Stang, James I.	Partner	675.00	7.70	\$5,197.50
KHB	Brown, Kenneth H.	Partner	675.00	2.20	\$1,485.00
LAF	Forrester, Leslie A.	Other	475.00	2.40	\$1,140.00
				<hr/> 35.50	<hr/> \$23,482.50



---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition [B130]	1.20	\$810.00
BL	Bankruptcy Litigation [L430]	7.30	\$4,507.50
CA	Case Administration [B110]	0.30	\$202.50
CO	Claims Admin/Objections[B310]	0.30	\$202.50
GC	General Creditors Comm. [B150]	6.70	\$4,522.50
IC	Insurance Coverage	6.70	\$4,462.50
ME	Mediation	12.10	\$8,167.50
PD	Plan & Disclosure Stmt. [B320]	0.70	\$472.50
SL	Stay Litigation [B140]	0.20	\$135.00
		35.50	<hr/> \$23,482.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 128006  
April 30, 2021

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Bloomberg	\$19.70
Conference Call [E105]	\$83.14
Lexis/Nexis- Legal Research [E	\$18.60
Pacer - Court Research	\$26.00
Research [E106]	\$500.00
	<hr/>
	\$647.44

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Disposition [B130]</b>						
04/05/2021	JIS	AD	Call Ford Elsaesser regarding real property sales.	0.60	675.00	\$405.00
04/05/2021	JIS	AD	Call regarding empty SFR which should be sold.	0.10	675.00	\$67.50
04/14/2021	JIS	AD	Call Ford Elsaesser regarding IHRC sale.	0.10	675.00	\$67.50
04/19/2021	JIS	AD	Call with media re status of IHRC sale.	0.40	675.00	\$270.00
				<b>1.20</b>		<b>\$810.00</b>
<b>Bankruptcy Litigation [L430]</b>						
04/09/2021	KHB	BL	Review media report on avoidance litigation and settlement.	0.20	675.00	\$135.00
04/13/2021	KHB	BL	Review emails from mediator and SCC re insurance settlement issues.	0.60	675.00	\$405.00
04/21/2021	JIS	BL	Review property pleadings from Diocese of Agana litigation.	0.60	675.00	\$405.00
04/21/2021	KHB	BL	Telephone call with J. Stang re litigation in Guam over separateness of parishes and application of canon or civil law (.2); obtain and review briefs re same (.6).	0.80	675.00	\$540.00
04/21/2021	LAF	BL	Legal research re: Parish property in Agana case.	1.00	475.00	\$475.00
04/21/2021	GSG	BL	Emails re status and related decision.	0.10	675.00	\$67.50
04/23/2021	LAF	BL	Legal research re: Parish property in Agana case.	0.30	475.00	\$142.50
04/23/2021	GSG	BL	Review Agana briefing re summary judgment on issues of parishes as a division of the diocese.	2.90	675.00	\$1,957.50
04/26/2021	LAF	BL	Obtain pleadings from Bronx church case.	0.80	475.00	\$380.00
				<b>7.30</b>		<b>\$4,507.50</b>
<b>Case Administration [B110]</b>						
04/28/2021	GSG	CA	Emails re status and calendaring of adversaries; review 10th Circuit order re 90-day stay and pending deadlines.	0.30	675.00	\$202.50
				<b>0.30</b>		<b>\$202.50</b>
<b>Claims Admin/Objections[B310]</b>						
04/06/2021	IAWN	CO	Exchange emails with James I Stang and Lee re claims numbers	0.10	675.00	\$67.50
04/14/2021	JIS	CO	Organize abuse claims for review by committee.	0.20	675.00	\$135.00

				0.30		\$202.50
<b>General Creditors Comm. [B150]</b>						
04/02/2021	JIS	GC	Call with State Counsel Counsel re insurance issues and case status.	0.40	675.00	\$270.00
04/04/2021	IAWN	GC	Exchange emails with James, Stang and Scharf re Future claims rep and role	0.20	675.00	\$135.00
04/05/2021	IAWN	GC	Exchange emails with De La Cruz and Linnenberger re SOL issues	0.10	675.00	\$67.50
04/05/2021	IAWN	GC	Attend mediation call with Malott and SCC	0.90	675.00	\$607.50
04/08/2021	JIS	GC	Call with media re case status.	0.40	675.00	\$270.00
04/14/2021	IDS	GC	Attend committee call regarding insurance mediation.	0.70	675.00	\$472.50
04/15/2021	JIS	GC	Call K. Brown regarding mediation status and impact on pending property litigation.	0.20	675.00	\$135.00
04/16/2021	JIS	GC	Call with State Court Counsel regarding mediation issues.	1.20	675.00	\$810.00
04/16/2021	IDS	GC	SCC call regarding mediation.	1.30	675.00	\$877.50
04/21/2021	JIS	GC	Call B. Hall regarding case status and follow up with Committee re meeting.	0.10	675.00	\$67.50
04/23/2021	JIS	GC	State Court Counsel call regarding mediation and case issues.	1.00	675.00	\$675.00
04/28/2021	JIS	GC	Call F. Elsaesser regarding case and mediation status and email to Committee re same.	0.10	675.00	\$67.50
04/28/2021	JIS	GC	Review Debtor's update regarding mediation and property sale.	0.10	675.00	\$67.50
				<b>6.70</b>		<b>\$4,522.50</b>

### Insurance Coverage

04/01/2021	IAWN	IC	Prep for call with SCC, re buyback (1.2) IC; telephone conference with James I Stang and SCC, re options (.7), IC; exchange emails with SCC re comments to Malott (.8) ME	2.70	675.00	\$1,822.50
04/02/2021	IAWN	IC	Review emails from SCC re timing and need for call with Malott (.5), exchange emails with Malott re call with SCC (.1) ; exchange emails with SCC re settlement calculations (.3) ME	0.90	675.00	\$607.50
04/16/2021	IAWN	IC	Telephone conference w/ SCC re mediation	1.20	675.00	\$810.00
04/16/2021	IAWN	IC	Research arbitration under NM law	1.00	675.00	\$675.00
04/16/2021	IAWN	IC	Exchange emails with James I Stang re arbitration	0.10	675.00	\$67.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/16/2021	LAF	IC	Legal research re: Uniform Arbitration Act.	0.30	475.00	\$142.50
04/19/2021	IAWN	IC	Exchange emails with Murray re progress call	0.10	675.00	\$67.50
04/21/2021	IAWN	IC	Exchange emails with Murray re telephone call	0.10	675.00	\$67.50
04/21/2021	IAWN	IC	Review Linnenberger email re mediation	0.10	675.00	\$67.50
04/28/2021	IAWN	IC	Exchange emails with Blumel, Monagle re communicating with diocese	0.20	675.00	\$135.00
				<b>6.70</b>		<b>\$4,462.50</b>

### Mediation

04/01/2021	JIS	ME	Call with mediator regarding settlement.	0.70	675.00	\$472.50
04/05/2021	IAWN	ME	Exchange emails with SCC re mediation tactics	0.20	675.00	\$135.00
04/06/2021	IAWN	ME	Review settlement letters to insurers from Debtor	1.40	675.00	\$945.00
04/07/2021	IAWN	ME	Analyze settlement demands	0.20	675.00	\$135.00
04/07/2021	IAWN	ME	Exchange emails with Elaessar re wrong numbers	0.10	675.00	\$67.50
04/07/2021	JIS	ME	Review insurance demand letters and forward to Committee and State Court Counsel.	0.30	675.00	\$202.50
04/10/2021	IAWN	ME	Exchange emails with James I Stang re timing of mediation	0.10	675.00	\$67.50
04/13/2021	IAWN	ME	Review Malott report on mediation	0.10	675.00	\$67.50
04/13/2021	IAWN	ME	Review SCC emails re mediation progress	0.50	675.00	\$337.50
04/13/2021	IDS	ME	Emails with SCC and James Stang, IAWN regarding mediation.	0.50	675.00	\$337.50
04/14/2021	IAWN	ME	Review Robert Saunders research re arbitrability (.5); review Ford's cases, article and email re strategy (.8); pull and send article re SIRs (.1); telephone conference w/ TCC re mediation and arbitration (.5); exchange emails with SCC re mediation (.5)	2.40	675.00	\$1,620.00
04/14/2021	JIS	ME	Prepare email to Committee regarding status of mediation.	0.50	675.00	\$337.50
04/14/2021	JIS	ME	Call B. Hall regarding status of mediation and forward strategy.	0.20	675.00	\$135.00
04/14/2021	JIS	ME	Call F. Elsaesser regarding mediation status.	0.20	675.00	\$135.00
04/16/2021	IAWN	ME	Telephone conference with SCC re mediation	1.00	675.00	\$675.00
04/16/2021	IAWN	ME	Telephone conference with Murray re mediation	0.20	675.00	\$135.00
04/16/2021	IDS	ME	Email to IAWN, James Stang regarding plan/settlement terms.	0.40	675.00	\$270.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/21/2021	JIS	ME	Call mediator re status.	0.10	675.00	\$67.50
04/22/2021	IAWN	ME	Draft and send email to Murray re progress report	0.10	675.00	\$67.50
04/22/2021	IAWN	ME	Review Murray response	0.10	675.00	\$67.50
04/22/2021	IAWN	ME	Review Elaesser report re progress	0.10	675.00	\$67.50
04/22/2021	IAWN	ME	Respond to Murray	0.10	675.00	\$67.50
04/23/2021	IAWN	ME	Exchange emails with Murray re call	0.10	675.00	\$67.50
04/23/2021	IAWN	ME	Telephone conference with Murray re mediation progress	0.30	675.00	\$202.50
04/23/2021	IDS	ME	SCC meeting regarding mediation.	1.00	675.00	\$675.00
04/28/2021	IAWN	ME	Review SCC emails re mediation progress ME	0.30	675.00	\$202.50
04/29/2021	IAWN	ME	Review Elaesser report re mediation progress	0.10	675.00	\$67.50
04/29/2021	IAWN	ME	Telephone conference with Murray re mediation (.5); draft and send report of Murray telephone call (.1); review Vernon and Monagle responses re same, (.1)	0.70	675.00	\$472.50
04/30/2021	IAWN	ME	Review Malott report re mediation	0.10	675.00	\$67.50
				<u>12.10</u>		<u>\$8,167.50</u>

**Plan & Disclosure Stmt. [B320]**

04/14/2021	KHB	PD	Emails from J. Stang and Judge Malott re status of mediation on insurance issues.	0.20	675.00	\$135.00
04/15/2021	KHB	PD	Confer with J. Stang re status of insurance mediation and impact on avoidance AVPs.	0.20	675.00	\$135.00
04/16/2021	IAWN	PD	Exchange emails with Ilan Scharf and James I Stang re insurance neutral plan	0.10	675.00	\$67.50
04/16/2021	KHB	PD	Review emails from SCC re insurance mediation issues.	0.20	675.00	\$135.00
				<u>0.70</u>		<u>\$472.50</u>

**Stay Litigation [B140]**

04/14/2021	JIS	SL	Call I. Scharf regarding stay relief strategy.	0.20	675.00	\$135.00
				<u>0.20</u>		<u>\$135.00</u>

**TOTAL SERVICES FOR THIS MATTER:**

**\$23,482.50**

---

**Expenses**

04/14/2021	CC	Conference Call [E105] Loop Up Conference Call, JIS	51.30
04/16/2021	LN	05066.00002 Lexis Charges for 04-16-21	9.30
04/23/2021	CC	Conference Call [E105] AT&T Conference Call, JIS	31.77
04/26/2021	BB	05066.00002 Bloomberg Charges through 04-26-21	19.70
04/26/2021	LN	05066.00002 Lexis Charges for 04-26-21	9.30
04/30/2021	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.07
04/30/2021	RS	Research [E106] Everlaw, Inc. Inv. 39708	500.00
04/30/2021	PAC	Pacer - Court Research	26.00
<b>Total Expenses for this Matter</b>			<b>\$647.44</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 04/30/2021**

**Total Fees \$23,482.50**

**Total Expenses 647.44**

**Total Due on Current Invoice \$24,129.94**

**Outstanding Balance from prior invoices as of 04/30/2021 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75



---

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$17,854.87
126833	09/30/2020	\$7,512.50	\$567.41	\$1,878.12
126904	10/31/2020	\$89,325.00	\$2,234.47	\$22,331.25
126905	11/30/2020	\$86,197.50	\$641.07	\$21,549.37
126906	12/31/2020	\$151,132.50	\$506.90	\$37,783.12
127999	01/31/2021	\$183,875.00	\$2,017.29	\$185,892.29
128001	02/28/2021	\$123,550.00	\$1,724.62	\$125,274.62
128003	03/31/2021	\$51,705.00	\$722.35	\$52,427.35

**Total Amount Due on Current and Prior Invoices:**

**\$835,296.57**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

May 31, 2021

Invoice 128022

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2021**

FEES	\$18,427.50
EXPENSES	\$505.20
<b>TOTAL CURRENT CHARGES</b>	<b>\$18,932.70</b>
<b>BALANCE FORWARD</b>	<b>\$835,296.57</b>
<b>TOTAL BALANCE DUE</b>	<b>\$854,229.27</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	0.60	\$405.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	8.10	\$5,467.50
IDS	Scharf, Ilan D.	Partner	675.00	7.00	\$4,725.00
JIS	Stang, James I.	Partner	675.00	11.00	\$7,425.00
KHB	Brown, Kenneth H.	Partner	675.00	0.60	\$405.00
				<hr/> 27.30	<hr/> \$18,427.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	1.30	\$877.50
CO	Claims Admin/Objections[B310]	1.50	\$1,012.50
GC	General Creditors Comm. [B150]	12.40	\$8,370.00
IC	Insurance Coverage	8.50	\$5,737.50
ME	Mediation	2.00	\$1,350.00
PD	Plan & Disclosure Stmt. [B320]	1.60	\$1,080.00
		27.30	<hr/> \$18,427.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 128022  
May 31, 2021

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Outside Services	\$500.00
Pacer - Court Research	\$5.20
	<hr/>
	\$505.20

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Bankruptcy Litigation [L430]</b>						
05/03/2021	JIS	BL	Attend status conference on adversary proceeding regarding property transfers.	0.20	675.00	\$135.00
05/03/2021	JIS	BL	Call K. Brown regarding AVP status conference.	0.10	675.00	\$67.50
05/03/2021	KHB	BL	Confer with J. Stang re status conference on adversary proceedings.	0.20	675.00	\$135.00
05/03/2021	GSG	BL	Attend telephonic status conference.	0.30	675.00	\$202.50
05/13/2021	GSG	BL	Review Thuma opinion re creditor motion and direction to file AVP.	0.30	675.00	\$202.50
05/18/2021	KHB	BL	Review opinion on relief from stay.	0.20	675.00	\$135.00
				<b>1.30</b>		<b>\$877.50</b>
<b>Claims Admin/Objections[B310]</b>						
05/05/2021	IDS	CO	Analysis of claims valuation (1/3).	1.50	675.00	\$1,012.50
				<b>1.50</b>		<b>\$1,012.50</b>
<b>General Creditors Comm. [B150]</b>						
05/03/2021	JIS	GC	Call from abuse survivor regarding case status.	0.50	675.00	\$337.50
05/05/2021	JIS	GC	Committee call regarding real property sales and insurance mediation.	0.80	675.00	\$540.00
05/07/2021	JIS	GC	State Court Counsel call regarding arbitration and stay relief issues.	1.30	675.00	\$877.50
05/07/2021	IDS	GC	Attend SCC meeting.	1.00	675.00	\$675.00
05/12/2021	JIS	GC	Draft email to committee re mediation status.	0.10	675.00	\$67.50
05/14/2021	IDS	GC	SCC meeting regarding arbitration process.	1.20	675.00	\$810.00
05/21/2021	JIS	GC	Meeting with state court counsel re case status: arbitration and plan alternatives.	1.90	675.00	\$1,282.50
05/21/2021	IDS	GC	SCC meeting regarding settlement of options.	1.00	675.00	\$675.00
05/24/2021	JIS	GC	Draft email to Committee regarding mediation issues.	0.30	675.00	\$202.50
05/26/2021	JIS	GC	Attend committee call re arbitration and plan issues.	1.30	675.00	\$877.50
05/28/2021	JIS	GC	Review emails and docket for State Court Counsel update call.	0.50	675.00	\$337.50
05/28/2021	JIS	GC	Call with State Court Counsel regarding arbitration and case issues.	1.10	675.00	\$742.50
05/28/2021	IDS	GC	SCC meeting regarding arbitrator selection.	1.40	675.00	\$945.00

				12.40		\$8,370.00
<b>Insurance Coverage</b>						
05/05/2021	IDS	IC	Telephone call with Malott regarding mediation with insurers.	0.50	675.00	\$337.50
05/10/2021	IAWN	IC	Exchange emails with Ilan Scharf and James I Stang re Murray progress	0.10	675.00	\$67.50
05/11/2021	IAWN	IC	Review Elssaer email re delay on call (.1), exchange emails with Murray re need for progress report (.1); review James I Stang email re Malott telephone call (.1); telephone call with Murray re progress (.1); email SCC re telephone call w/ Murray (.1)	0.50	675.00	\$337.50
05/12/2021	IAWN	IC	Review and respond to Ilan Scharf email re scoring chart	0.10	675.00	\$67.50
05/13/2021	IAWN	IC	Review file re scoring chart (.2); forward same to Ilan Scharf and James I Stang (.1); exchange emails re same with Ilan Scharf and James I Stang (.1)	0.40	675.00	\$270.00
05/16/2021	IAWN	IC	Exchange emails with James I Stang re Murray and arbitration (.1); exchange emails with Mallott re mediation (.1)	0.20	675.00	\$135.00
05/17/2021	IAWN	IC	Review Mallott report and provide James I Stang with comments	0.30	675.00	\$202.50
05/18/2021	IAWN	IC	Review Thuma stay decision	0.20	675.00	\$135.00
05/19/2021	IAWN	IC	Exchange emails and telephone call with Murray re demand	0.10	675.00	\$67.50
05/19/2021	IAWN	IC	Exchange emails with Berg re same	0.10	675.00	\$67.50
05/19/2021	IAWN	IC	Exchange emails with Ilan Scharf and James I Stang re demand	0.10	675.00	\$67.50
05/19/2021	IDS	IC	Email with IAWN regarding insurance arbitration.	0.40	675.00	\$270.00
05/20/2021	IAWN	IC	Review James I Stang email to SCC with demand	0.10	675.00	\$67.50
05/20/2021	IAWN	IC	Forward covering email from Carter	0.10	675.00	\$67.50
05/20/2021	IAWN	IC	Review James I Stang lengthy email to TCC re firm website information on abuse cases	0.20	675.00	\$135.00
05/21/2021	IAWN	IC	Telephone conference w/ SCC re arbitration demand	1.60	675.00	\$1,080.00
05/21/2021	IAWN	IC	Prep for call review Malott report and demand	1.20	675.00	\$810.00
05/24/2021	IAWN	IC	Exchange emails with Blumel and Hall re arbitrators	0.10	675.00	\$67.50
05/25/2021	IAWN	IC	Exchange emails with Hall and Linnenberger re arbitrator	0.10	675.00	\$67.50
05/26/2021	IAWN	IC	Exchange emails with Murray re demand	0.10	675.00	\$67.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/26/2021	IAWN	IC	Exchange emails with Carter re call	0.10	675.00	\$67.50
05/26/2021	IAWN	IC	Telephone conference with Carter re insurance involvement etc.	0.40	675.00	\$270.00
05/26/2021	IAWN	IC	Draft email for SCC describing call and issues	0.20	675.00	\$135.00
05/27/2021	IAWN	IC	Review Elassaer email re status, including insurance demand	0.10	675.00	\$67.50
05/27/2021	IAWN	IC	Exchange emails with Elassaer re call, review demand	1.00	675.00	\$675.00
05/28/2021	IAWN	IC	Exchange emails with Elassaer and Murray re call	0.10	675.00	\$67.50
05/28/2021	IAWN	IC	Review Elassaer latest report	0.10	675.00	\$67.50
				<b>8.50</b>		<b>\$5,737.50</b>

#### Mediation

05/05/2021	JIS	ME	Call with I. Scharf and Mediator regarding status of insurance mediation.	0.40	675.00	\$270.00
05/11/2021	IAWN	ME	Telephone conference with Murray re mediation	0.10	675.00	\$67.50
05/11/2021	JIS	ME	Call mediator regarding status.	0.50	675.00	\$337.50
05/11/2021	JIS	ME	Call B. Hall regarding mediation status.	0.20	675.00	\$135.00
05/11/2021	JIS	ME	Call I. Nasatir regarding insurance and mediation status.	0.20	675.00	\$135.00
05/12/2021	KHB	ME	Review emails from J. Stang and Debtor's counsel re status of mediation with insurers.	0.20	675.00	\$135.00
05/15/2021	IAWN	ME	Review Mallott report re mediation (.1); email James I Stang with changes/issues on report (.1); review Ilan Scharf email re report (.1); review Ilan Scharf email re Mallott suggestion (.1)	0.40	675.00	\$270.00
				<b>2.00</b>		<b>\$1,350.00</b>

#### Plan & Disclosure Stmt. [B320]

05/10/2021	JIS	PD	Call I. Scharf regarding arbitration issues.	0.40	675.00	\$270.00
05/14/2021	JIS	PD	State Court Counsel call regarding arbitration.	0.80	675.00	\$540.00
05/24/2021	JIS	PD	Call C. Paez regarding mediation issues.	0.40	675.00	\$270.00
				<b>1.60</b>		<b>\$1,080.00</b>

**TOTAL SERVICES FOR THIS MATTER:**

**\$18,427.50**



Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 8  
Invoice 128022  
May 31, 2021

---

**Expenses**

05/31/2021	OS	Everlaw, Inv. 40892, AD Santa Fe database for the month of May	500.00
------------	----	--	--------

05/31/2021	PAC	Pacer - Court Research	5.20
------------	-----	------------------------	------

<b>Total Expenses for this Matter</b>			<b>\$505.20</b>
---------------------------------------	--	--	-----------------

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 05/31/2021**

**Total Fees \$18,427.50**

**Total Expenses 505.20**

**Total Due on Current Invoice \$18,932.70**

**Outstanding Balance from prior invoices as of 05/31/2021 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$17,854.87
126833	09/30/2020	\$7,512.50	\$567.41	\$1,878.12
126904	10/31/2020	\$89,325.00	\$2,234.47	\$22,331.25
126905	11/30/2020	\$86,197.50	\$641.07	\$21,549.37
126906	12/31/2020	\$151,132.50	\$506.90	\$37,783.12
127999	01/31/2021	\$183,875.00	\$2,017.29	\$185,892.29
128001	02/28/2021	\$123,550.00	\$1,724.62	\$125,274.62
128003	03/31/2021	\$51,705.00	\$722.35	\$52,427.35
128006	04/30/2021	\$23,482.50	\$647.44	\$24,129.94

**Total Amount Due on Current and Prior Invoices: \$854,229.27**

# **Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

June 30, 2021

JIS

Invoice 128420

Client 05066

Matter 00002

**JIS**

RE: Committee Representation

---

## **STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 06/30/2021**

FEES	\$14,242.50
------	-------------

EXPENSES	\$152.70
----------	----------

<b>TOTAL CURRENT CHARGES</b>	<b>\$14,395.20</b>
------------------------------	--------------------

<b>BALANCE FORWARD</b>	<b>\$854,229.27</b>
------------------------	---------------------

<b>TOTAL BALANCE DUE</b>	<b>\$868,624.47</b>
--------------------------	---------------------

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	0.30	\$202.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	8.60	\$5,805.00
IDS	Scharf, Ilan D.	Partner	675.00	5.10	\$3,442.50
JIS	Stang, James I.	Partner	675.00	5.60	\$3,780.00
KHB	Brown, Kenneth H.	Partner	675.00	1.50	\$1,012.50
				21.10	\$14,242.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AP	Appeals [B430]	1.20	\$810.00
BL	Bankruptcy Litigation [L430]	4.80	\$3,240.00
CO	Claims Admin/Objections[B310]	0.40	\$270.00
GC	General Creditors Comm. [B150]	6.20	\$4,185.00
H	Hearings	0.50	\$337.50
IC	Insurance Coverage	8.00	\$5,400.00
		21.10	<hr/> \$14,242.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 128420  
June 30, 2021

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$152.70
	<hr/>
	\$152.70

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Appeals [B430]</b>						
06/25/2021	KHB	AP	Review emails from R. Charles and draft report to 10th Cir. (.3); confer with G. Greenwood re same (.1).	0.40	675.00	\$270.00
06/25/2021	GSG	AP	Review email and proposed stip re 10th Cir. BAP joint report.	0.10	675.00	\$67.50
06/29/2021	KHB	AP	Review and revise stipulation to continue appeal dates (.3); emails R. Charles re same (.2).	0.50	675.00	\$337.50
06/29/2021	GSG	AP	Call with K. Brown re 10th Cir. joint report and revisions; review emails re same.	0.20	675.00	\$135.00
				<b>1.20</b>		<b>\$810.00</b>
<b>Bankruptcy Litigation [L430]</b>						
06/14/2021	KHB	BL	Attend status conference for fraudulent transfer adversary proceedings (.2); confer with J. Stang re mediation status in preparation for status conference (.1).	0.30	675.00	\$202.50
06/20/2021	IDS	BL	Draft response regarding Chapter 7 ownership of claim dispute.	1.20	675.00	\$810.00
06/20/2021	IDS	BL	Telephone conference with Jim Stang regarding ownership of claim issues.	0.30	675.00	\$202.50
06/21/2021	JIS	BL	Review/revise response to Trustee's motion.	0.90	675.00	\$607.50
06/21/2021	JIS	BL	Call I. Scharf regarding response to Trustee's motion.	0.30	675.00	\$202.50
06/21/2021	IDS	BL	Finalize/review statement regarding ownership of Chapter 7 claims.	0.30	675.00	\$202.50
06/22/2021	JIS	BL	Review pleadings related to Chapter 7 trustee's ownership motion.	0.50	675.00	\$337.50
06/22/2021	KHB	BL	Review opposition to Trustees' motion to administer claims.	0.20	675.00	\$135.00
06/22/2021	IDS	BL	Email with SCC regarding Ch. 7 claims ownership.	0.20	675.00	\$135.00
06/25/2021	JIS	BL	Review and comment on proposed chapter 7 stipulation.	0.30	675.00	\$202.50
06/25/2021	JIS	BL	Review emails regarding chapter 7 trustee stipulation.	0.30	675.00	\$202.50
				<b>4.80</b>		<b>\$3,240.00</b>



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Claims Admin/Objections[B310]</b>						
06/02/2021	IDS	CO	Review issues related to Chapter trustee access to POCs.	0.40	675.00	\$270.00
				<b>0.40</b>		<b>\$270.00</b>

<b>General Creditors Comm. [B150]</b>						
06/02/2021	IDS	GC	Telephone call with James Stang regarding arbitration, chapter 7 trustee issues.	0.30	675.00	\$202.50
06/11/2021	JIS	GC	Committee meeting regarding arbitration.	0.80	675.00	\$540.00
06/11/2021	IDS	GC	Attend SCC call.	0.80	675.00	\$540.00
06/15/2021	JIS	GC	Call D. Fasy regarding issues related to Chapter 7 cases.	0.30	675.00	\$202.50
06/15/2021	IDS	GC	Email regarding Chapter 17 trustee claims to D. Fasy.	0.30	675.00	\$202.50
06/16/2021	JIS	GC	Draft status memo to Committee.	0.10	675.00	\$67.50
06/16/2021	JIS	GC	Call with survivor regarding case status.	0.20	675.00	\$135.00
06/16/2021	JIS	GC	Call F. Elsaesser regarding case status.	0.30	675.00	\$202.50
06/18/2021	IAWN	GC	Preparation for call with SCC	0.10	675.00	\$67.50
06/18/2021	IAWN	GC	Telephone conference w/ SCC re arbitration	1.00	675.00	\$675.00
06/18/2021	JIS	GC	Call with State Court Counsel regarding arbitration, property sale status and property of estate issues.	1.00	675.00	\$675.00
06/18/2021	IDS	GC	Attend SCC call regarding arbitration, Chapter 7 trustee issues.	1.00	675.00	\$675.00
				<b>6.20</b>		<b>\$4,185.00</b>

### Hearings

06/25/2021	JIS	H	Attend status call regarding chapter 7 trustee issues.	0.50	675.00	\$337.50
				<b>0.50</b>		<b>\$337.50</b>

### Insurance Coverage

06/01/2021	IAWN	IC	Telephone conference with Murray re arbitration progress	0.40	675.00	\$270.00
06/01/2021	IAWN	IC	Draft email to SCC re Murray telephone call	0.20	675.00	\$135.00
06/02/2021	KHB	IC	Emails from I. Nassatir re insurance issues.	0.10	675.00	\$67.50
06/04/2021	IAWN	IC	Review recent arbitration decision re compelling in bankruptcy	0.30	675.00	\$202.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/04/2021	IAWN	IC	Review SCC emails re Murchison as arbitrator and comment re same to Stang	0.20	675.00	\$135.00
06/04/2021	JIS	IC	Review emails regarding arbitration.	0.10	675.00	\$67.50
06/07/2021	IAWN	IC	Review Murray latest draft and email explaining same	0.80	675.00	\$540.00
06/11/2021	IAWN	IC	Telephone conference w/ SCC re arbitration demands	1.00	675.00	\$675.00
06/11/2021	IAWN	IC	Review demand	1.00	675.00	\$675.00
06/11/2021	IAWN	IC	Draft and send comments on demand to Murray	0.20	675.00	\$135.00
06/11/2021	IAWN	IC	Exchange emails with Elassaer re arbitration demand	0.10	675.00	\$67.50
06/15/2021	IAWN	IC	Exchange emails with Murray and Carter re consolidation issue	0.20	675.00	\$135.00
06/15/2021	IAWN	IC	Exchange emails re arbitrators with SCC and Murray	0.10	675.00	\$67.50
06/15/2021	IAWN	IC	Review article re consolidation issue for Murray	0.10	675.00	\$67.50
06/16/2021	IAWN	IC	Exchange emails with SCC re arbitrators	0.40	675.00	\$270.00
06/16/2021	IDS	IC	Review correspondence regarding insurance arbitrator selection.	0.30	675.00	\$202.50
06/17/2021	IAWN	IC	Email SCC with summary of arbitrator issues	0.20	675.00	\$135.00
06/17/2021	IAWN	IC	Exchange emails with James I Stang and Ford re summary of arbitrator issues	0.10	675.00	\$67.50
06/17/2021	IAWN	IC	Review SCC emails re arbitrators	0.20	675.00	\$135.00
06/17/2021	IAWN	IC	Exchange emails with Murray re demand status	0.10	675.00	\$67.50
06/17/2021	IAWN	IC	Exchange emails with Murray re arbitrators	0.20	675.00	\$135.00
06/18/2021	IAWN	IC	Email Murray list of arbitrators (.1); review demand (.5); review prior letters (.2)	0.80	675.00	\$540.00
06/22/2021	IAWN	IC	Exchange emails with James I Stang re ADSF Arrowood coverage	0.10	675.00	\$67.50
06/22/2021	IAWN	IC	Review ADSF coverage charts	0.10	675.00	\$67.50
06/22/2021	IAWN	IC	Review Terrell article re Arrowood financial condition	0.70	675.00	\$472.50
				<b>8.00</b>		<b>\$5,400.00</b>

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 8  
Invoice 128420  
June 30, 2021

---

**TOTAL SERVICES FOR THIS MATTER:**

**\$14,242.50**

**Expenses**

05/05/2021	CC	Conference Call [E105] Loop Up Conference Call, JIS	57.62
05/26/2021	CC	Conference Call [E105] Loop Up Conference Call, JIS	95.08
<b>Total Expenses for this Matter</b>			<b>\$152.70</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 06/30/2021**

**Total Fees \$14,242.50**

**Total Expenses 152.70**

**Total Due on Current Invoice \$14,395.20**

**Outstanding Balance from prior invoices as of 06/30/2021 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

---

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$17,854.87
126833	09/30/2020	\$7,512.50	\$567.41	\$1,878.12
126904	10/31/2020	\$89,325.00	\$2,234.47	\$22,331.25
126905	11/30/2020	\$86,197.50	\$641.07	\$21,549.37
126906	12/31/2020	\$151,132.50	\$506.90	\$37,783.12
127999	01/31/2021	\$183,875.00	\$2,017.29	\$185,892.29
128001	02/28/2021	\$123,550.00	\$1,724.62	\$125,274.62
128003	03/31/2021	\$51,705.00	\$722.35	\$52,427.35
128006	04/30/2021	\$23,482.50	\$647.44	\$24,129.94
128022	05/31/2021	\$18,427.50	\$505.20	\$18,932.70

**Total Amount Due on Current and Prior Invoices:**

**\$868,624.47**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

July 30, 2021

Invoice 128854

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 07/30/2021**

FEES \$3,847.50

EXPENSES \$9.50

**TOTAL CURRENT CHARGES** **\$3,857.00**

**BALANCE FORWARD** **\$868,624.47**

**TOTAL BALANCE DUE** **\$872,481.47**

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 2  
Invoice 128854  
July 30, 2021

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
IAWN	Nasatir, Iain A. W.	Partner	675.00	1.90	\$1,282.50
JIS	Stang, James I.	Partner	675.00	2.60	\$1,755.00
KHB	Brown, Kenneth H.	Partner	675.00	1.20	\$810.00
				<hr/> 5.70	<hr/> \$3,847.50



---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition [B130]	0.60	\$405.00
BL	Bankruptcy Litigation [L430]	3.10	\$2,092.50
GC	General Creditors Comm. [B150]	1.80	\$1,215.00
IC	Insurance Coverage	0.20	\$135.00
		5.70	<hr/> \$3,847.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 128854  
July 30, 2021

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Pacer - Court Research	\$9.50
	<hr/>
	\$9.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Disposition [B130]</b>						
07/08/2021	JIS	AD	Review emails from Debtor with real property reports.	0.40	675.00	\$270.00
07/28/2021	JIS	AD	Review Debtor's real estate report.	0.20	675.00	\$135.00
				<b>0.60</b>		<b>\$405.00</b>
<b>Bankruptcy Litigation [L430]</b>						
07/13/2021	IAWN	BL	Telephone conference with Stang re arbitration demand	0.10	675.00	\$67.50
07/13/2021	IAWN	BL	Review issues regarding arbitration	0.80	675.00	\$540.00
07/13/2021	IAWN	BL	Further review issues regarding arbitration	0.40	675.00	\$270.00
07/13/2021	IAWN	BL	Review emails with Stang regarding arbitration	0.20	675.00	\$135.00
07/13/2021	IAWN	BL	Review Stang emails to Elsaesser and TCC re access to information	0.10	675.00	\$67.50
07/16/2021	KHB	BL	Review recent authority re first amendment and religious freedom issues and emails with J. Stang and K. Dine re same.	1.20	675.00	\$810.00
07/21/2021	IAWN	BL	Exchange emails with SCC and Stang re sealing motion re demand	0.10	675.00	\$67.50
07/21/2021	JIS	BL	Draft email to Committee re status of arbitration motion.	0.10	675.00	\$67.50
07/27/2021	JIS	BL	Review order regarding arbitration sealing motion and email to committee re same.	0.10	675.00	\$67.50
				<b>3.10</b>		<b>\$2,092.50</b>
<b>General Creditors Comm. [B150]</b>						
07/09/2021	JIS	GC	State Court Counsel call regarding case strategy related to chapter 7 cases and impact of BSA settlement on case.	0.80	675.00	\$540.00
07/16/2021	JIS	GC	Call state court counsel call regarding chapter 7 issues and status of arbitration.	0.30	675.00	\$202.50
07/21/2021	JIS	GC	Call with F. Elsaesser re case status.	0.20	675.00	\$135.00
07/23/2021	JIS	GC	Call with SCC regarding arbitration motion and impact of BSA plan on insurance.	0.20	675.00	\$135.00
07/28/2021	JIS	GC	Call Survivor regarding case status.	0.30	675.00	\$202.50
				<b>1.80</b>		<b>\$1,215.00</b>

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 6  
Invoice 128854  
July 30, 2021

---

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Insurance Coverage</b>						
07/01/2021	IAWN	IC	Review Elaesser and James I Stang emails re demand	0.10	675.00	\$67.50
07/07/2021	IAWN	IC	Review Murray email re status	0.10	675.00	\$67.50
				<u>0.20</u>		<u>\$135.00</u>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$3,847.50</b>

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 7  
Invoice 128854  
July 30, 2021

---

**Expenses**

07/30/2021 PAC Pacer - Court Research

9.50

**Total Expenses for this Matter**

**\$9.50**

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 07/30/2021**

**Total Fees \$3,847.50**

**Total Expenses 9.50**

**Total Due on Current Invoice \$3,857.00**

**Outstanding Balance from prior invoices as of 07/30/2021 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$17,854.87
126833	09/30/2020	\$7,512.50	\$567.41	\$1,878.12
126904	10/31/2020	\$89,325.00	\$2,234.47	\$22,331.25
126905	11/30/2020	\$86,197.50	\$641.07	\$21,549.37
126906	12/31/2020	\$151,132.50	\$506.90	\$37,783.12
127999	01/31/2021	\$183,875.00	\$2,017.29	\$185,892.29
128001	02/28/2021	\$123,550.00	\$1,724.62	\$125,274.62
128003	03/31/2021	\$51,705.00	\$722.35	\$52,427.35
128006	04/30/2021	\$23,482.50	\$647.44	\$24,129.94
128022	05/31/2021	\$18,427.50	\$505.20	\$18,932.70
128420	06/30/2021	\$14,242.50	\$152.70	\$14,395.20

**Total Amount Due on Current and Prior Invoices:**

**\$872,481.47**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

August 31, 2021

Invoice 128855

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 08/31/2021**

FEES \$6,952.50

EXPENSES \$1,000.06

**TOTAL CURRENT CHARGES** **\$7,952.56**

**BALANCE FORWARD** **\$872,481.47**

**TOTAL BALANCE DUE** **\$880,434.03**



---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GSG	Greenwood, Gail S.	Counsel	675.00	0.20	\$135.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	0.10	\$67.50
IDS	Scharf, Ilan D.	Partner	675.00	1.10	\$742.50
JIS	Stang, James I.	Partner	675.00	4.40	\$2,970.00
KHB	Brown, Kenneth H.	Partner	675.00	4.50	\$3,037.50
				<hr/> 10.30	<hr/> \$6,952.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition [B130]	0.40	\$270.00
AP	Appeals [B430]	0.80	\$540.00
BL	Bankruptcy Litigation [L430]	5.80	\$3,915.00
GC	General Creditors Comm. [B150]	0.80	\$540.00
H	Hearings	1.80	\$1,215.00
IC	Insurance Coverage	0.10	\$67.50
SL	Stay Litigation [B140]	0.60	\$405.00
		10.30	<hr/> \$6,952.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 128855  
August 31, 2021

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$0.06
Outside Services	\$500.00
Research [E106]	\$500.00
	<hr/>
	\$1,000.06

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Disposition [B130]</b>						
08/10/2021	JIS	AD	Review auction site.	0.40	675.00	\$270.00
				<b>0.40</b>		<b>\$270.00</b>
<b>Appeals [B430]</b>						
08/02/2021	KHB	AP	Review recent authority re religious liberty issues in bankruptcy.	0.60	675.00	\$405.00
08/19/2021	GSG	AP	Review emails and joint report re status.	0.20	675.00	\$135.00
				<b>0.80</b>		<b>\$540.00</b>
<b>Bankruptcy Litigation [L430]</b>						
08/02/2021	IAWN	BL	Review limited objection of chapter 7 trustee	0.10	675.00	\$67.50
08/13/2021	JIS	BL	Follow up to C. Paez email regarding status of insurance motion by calling I. Nasatir and email exchange with F. Esaesser.	0.20	675.00	\$135.00
08/17/2021	JIS	BL	Review insurer objections to the motion to seal documents.	0.10	675.00	\$67.50
08/18/2021	JIS	BL	Call with state court counsel regarding response to objections to motion to seal.	0.30	675.00	\$202.50
08/18/2021	IDS	BL	Review objections from insurers regarding confidentiality. (.9); email to James Stang regarding same. (.2)	1.10	675.00	\$742.50
08/19/2021	JIS	BL	Call with Ford Elsaesser regarding objections to motion to seal.	0.10	675.00	\$67.50
08/23/2021	JIS	BL	Call Ford Elsaesser regarding sealing hearing.	0.10	675.00	\$67.50
08/24/2021	JIS	BL	Review audio tape of hearing regarding sealing motion and email to parties re same.	0.50	675.00	\$337.50
08/25/2021	JIS	BL	Call with T. Walker and F. Elsaesser regarding form of order re sealing motion.	0.20	675.00	\$135.00
08/26/2021	KHB	BL	Confer with J. Stang re hearing on motion to seal.	0.20	675.00	\$135.00
08/27/2021	KHB	BL	Review briefs on motion to seal and listen to transcript of hearing in preparation for hearing on form of order (2.5); confer with J. Stang re same (.2).	2.70	675.00	\$1,822.50
08/31/2021	KHB	BL	Review order and emails from Debtor's counsel re order on motion to seal.	0.20	675.00	\$135.00
				<b>5.80</b>		<b>\$3,915.00</b>

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>General Creditors Comm. [B150]</b>						
08/06/2021	JIS	GC	Call with state court counsel regarding chapter 7 issues.	0.50	675.00	\$337.50
08/23/2021	JIS	GC	Call state court counsel re plan status.	0.20	675.00	\$135.00
08/25/2021	JIS	GC	Draft status report to Committee in lieu of Committee call.	0.10	675.00	\$67.50
				<b>0.80</b>		<b>\$540.00</b>
<b>Hearings</b>						
08/23/2021	JIS	H	Attend hearing regarding stay relief and motion to seal.	1.00	675.00	\$675.00
08/30/2021	KHB	H	Prepare for hearing on form of order on motion to seal and review emails re same (.3); attend hearing on motion to seal (.2); emails to J. Stang re same (.1); email from T. Walker re same (.1); confer with J. Stang re same (.1).	0.80	675.00	\$540.00
				<b>1.80</b>		<b>\$1,215.00</b>
<b>Insurance Coverage</b>						
08/23/2021	JIS	IC	Call B. Hall re form of order regarding sealing motion.	0.10	675.00	\$67.50
				<b>0.10</b>		<b>\$67.50</b>
<b>Stay Litigation [B140]</b>						
08/12/2021	JIS	SL	Review pleadings related to stay relief motion by creditor on defamation action.	0.60	675.00	\$405.00
				<b>0.60</b>		<b>\$405.00</b>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$6,952.50</b>

**Expenses**

07/31/2021	OS	Everlaw, Inv. 43208, AD Santa Fe database for the month of July	500.00
08/18/2021	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.06
08/31/2021	RS	Research [E106] Everlaw Inc. Inv. 44527	500.00
<b>Total Expenses for this Matter</b>			<b>\$1,000.06</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 08/31/2021**

**Total Fees \$6,952.50**

**Total Expenses 1,000.06**

**Total Due on Current Invoice \$7,952.56**

**Outstanding Balance from prior invoices as of 08/31/2021 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$17,854.87
126833	09/30/2020	\$7,512.50	\$567.41	\$1,878.12
126904	10/31/2020	\$89,325.00	\$2,234.47	\$22,331.25
126905	11/30/2020	\$86,197.50	\$641.07	\$21,549.37
126906	12/31/2020	\$151,132.50	\$506.90	\$37,783.12
127999	01/31/2021	\$183,875.00	\$2,017.29	\$185,892.29
128001	02/28/2021	\$123,550.00	\$1,724.62	\$125,274.62
128003	03/31/2021	\$51,705.00	\$722.35	\$52,427.35
128006	04/30/2021	\$23,482.50	\$647.44	\$24,129.94
128022	05/31/2021	\$18,427.50	\$505.20	\$18,932.70
128420	06/30/2021	\$14,242.50	\$152.70	\$14,395.20
128854	07/30/2021	\$3,847.50	\$9.50	\$3,857.00

**Total Amount Due on Current and Prior Invoices:**

**\$880,434.03**



# **Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

September 30, 2021

JIS

Invoice 128856

Client 05066

Matter 00002

**JIS**

RE: Committee Representation

---

## **STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 09/30/2021**

FEES	\$9,180.00
------	------------

EXPENSES	\$61.20
----------	---------

<b>TOTAL CURRENT CHARGES</b>	<b>\$9,241.20</b>
------------------------------	-------------------

<b>BALANCE FORWARD</b>	<b>\$880,434.03</b>
------------------------	---------------------

<b>TOTAL BALANCE DUE</b>	<b>\$889,675.23</b>
--------------------------	---------------------

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GNB	Brown, Gillian N.	Counsel	675.00	0.10	\$67.50
GSG	Greenwood, Gail S.	Counsel	675.00	0.50	\$337.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	9.20	\$6,210.00
JIS	Stang, James I.	Partner	675.00	3.40	\$2,295.00
KHB	Brown, Kenneth H.	Partner	675.00	0.40	\$270.00
				13.60	\$9,180.00

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AP	Appeals [B430]	0.90	\$607.50
BL	Bankruptcy Litigation [L430]	9.60	\$6,480.00
GC	General Creditors Comm. [B150]	2.20	\$1,485.00
IN	Interviews	0.10	\$67.50
PD	Plan & Disclosure Stmt. [B320]	0.80	\$540.00
		13.60	<hr/> \$9,180.00

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 128856  
September 30, 2021

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Pacer - Court Research	\$61.20
	<hr/>
	\$61.20

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Appeals [B430]</b>						
09/20/2021	KHB	AP	Emails with R. Charles re status report to 10th Cir. and review proposed status report (.2); emails with J. Stang re same (.1); emails with G. Greenwood re same (.1).	0.40	675.00	\$270.00
09/20/2021	GSG	AP	Review dockets re status conference and 10 Circuit appellate report and email R. Charles re same.	0.40	675.00	\$270.00
09/21/2021	GSG	AP	Review proposed stipulation re 10th Circuit stay and email K. Brown re same.	0.10	675.00	\$67.50
				<b>0.90</b>		<b>\$607.50</b>
<b>Bankruptcy Litigation [L430]</b>						
09/09/2021	JIS	BL	Reply to email regarding arbitration motion and scheduling hearing.	0.20	675.00	\$135.00
09/10/2021	IAWN	BL	Review insurers' objection to motion to compel	2.40	675.00	\$1,620.00
09/13/2021	IAWN	BL	Prepare for hearing by reviewing pleadings and coverage chart	1.00	675.00	\$675.00
09/13/2021	IAWN	BL	Attend hearing	0.40	675.00	\$270.00
09/13/2021	IAWN	BL	Review email regarding arbitration	0.10	675.00	\$67.50
09/13/2021	IAWN	BL	Review analysis of objections	0.20	675.00	\$135.00
09/13/2021	JIS	BL	Scheduling conference with BCT.	0.40	675.00	\$270.00
09/15/2021	IAWN	BL	Telephone conference with Stang re update	0.10	675.00	\$67.50
09/20/2021	JIS	BL	Call I. Nasatir regarding status of sealed pleadings and demand regarding unsealing for insurers.	0.10	675.00	\$67.50
09/20/2021	JIS	BL	Call with state court counsel regarding status of sealed pleadings and arbitration issues.	0.50	675.00	\$337.50
09/21/2021	IAWN	BL	Telephone conference with Stang re request for unsealing	0.10	675.00	\$67.50
09/21/2021	IAWN	BL	Review Stang update to committee on case issues	0.10	675.00	\$67.50
09/22/2021	IAWN	BL	Review insurers' response to unsealing request	0.10	675.00	\$67.50
09/22/2021	IAWN	BL	Exchange emails with Stang to unsealing request	0.10	675.00	\$67.50
09/22/2021	IAWN	BL	Draft and send response re unsealing request	0.20	675.00	\$135.00
09/22/2021	IAWN	BL	Exchange emails with Ford re docket	0.10	675.00	\$67.50
09/23/2021	IAWN	BL	Telephone conference with Stang re insurers' responses to motion to compel arbitration	0.10	675.00	\$67.50
09/23/2021	IAWN	BL	Exchange emails with Elaesser and Murray re reply brief timing	0.10	675.00	\$67.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/24/2021	IAWN	BL	Prepare for state court counsel call with review of briefing	1.00	675.00	\$675.00
09/24/2021	IAWN	BL	Telephone conference w/ SCC re briefing for motion and reply	1.70	675.00	\$1,147.50
09/24/2021	IAWN	BL	Telephone conference with Stang re insurance arbitration	0.10	675.00	\$67.50
09/24/2021	IAWN	BL	Review insurers' responses re unsealing	0.20	675.00	\$135.00
09/24/2021	IAWN	BL	Exchange emails with Walker re transcript	0.10	675.00	\$67.50
09/26/2021	IAWN	BL	Email Walker re transcript	0.10	675.00	\$67.50
09/29/2021	IAWN	BL	Exchange emails and telephone call with Gillian Brown re motion to unseal	0.10	675.00	\$67.50
				<b>9.60</b>		<b>\$6,480.00</b>

#### **General Creditors Comm. [B150]**

09/08/2021	JIS	GC	Call Lee James regarding case status.	0.20	675.00	\$135.00
09/21/2021	JIS	GC	Draft status email to committee.	0.30	675.00	\$202.50
09/24/2021	JIS	GC	Attend SCC call re case issues.	1.70	675.00	\$1,147.50
				<b>2.20</b>		<b>\$1,485.00</b>

#### **Interviews**

09/24/2021	GNB	IN	Email with Iain A.W.Nasatir regarding motion to compel insurers to withdraw confidentiality.	0.10	675.00	\$67.50
				<b>0.10</b>		<b>\$67.50</b>

#### **Plan & Disclosure Stmt. [B320]**

09/20/2021	IAWN	PD	Telephone conference w/ SCC re unsealing	0.50	675.00	\$337.50
09/20/2021	IAWN	PD	Exchange emails with Murray re transcript	0.10	675.00	\$67.50
09/20/2021	IAWN	PD	Draft email to insurers re unsealing	0.20	675.00	\$135.00
				<b>0.80</b>		<b>\$540.00</b>

#### **TOTAL SERVICES FOR THIS MATTER:**

**\$9,180.00**

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 7  
Invoice 128856  
September 30, 2021

---

**Expenses**

09/30/2021 PAC Pacer - Court Research

61.20

**Total Expenses for this Matter**

**\$61.20**

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 09/30/2021**

**Total Fees \$9,180.00**

**Total Expenses 61.20**

**Total Due on Current Invoice \$9,241.20**

**Outstanding Balance from prior invoices as of 09/30/2021 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75



125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$17,854.87
126833	09/30/2020	\$7,512.50	\$567.41	\$1,878.12
126904	10/31/2020	\$89,325.00	\$2,234.47	\$22,331.25
126905	11/30/2020	\$86,197.50	\$641.07	\$21,549.37
126906	12/31/2020	\$151,132.50	\$506.90	\$37,783.12
127999	01/31/2021	\$183,875.00	\$2,017.29	\$185,892.29
128001	02/28/2021	\$123,550.00	\$1,724.62	\$125,274.62
128003	03/31/2021	\$51,705.00	\$722.35	\$52,427.35
128006	04/30/2021	\$23,482.50	\$647.44	\$24,129.94
128022	05/31/2021	\$18,427.50	\$505.20	\$18,932.70
128420	06/30/2021	\$14,242.50	\$152.70	\$14,395.20
128854	07/30/2021	\$3,847.50	\$9.50	\$3,857.00
128855	08/31/2021	\$6,952.50	\$1,000.06	\$7,952.56

**Total Amount Due on Current and Prior Invoices:**

**\$889,675.23**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

October 31, 2021

Invoice 129066

Client 05066

Matter 00002

**JIS**

JIS

RE: Committee Representation

---

**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 10/31/2021**

FEES	\$24,757.50
EXPENSES	\$657.81
<b>TOTAL CURRENT CHARGES</b>	<b>\$25,415.31</b>
<b>BALANCE FORWARD</b>	<b>\$889,675.23</b>
<b>TOTAL BALANCE DUE</b>	<b>\$915,090.54</b>

---

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DHH	Hinojosa, Diane H.	Paralegal	395.00	12.00	\$4,740.00
GNB	Brown, Gillian N.	Counsel	675.00	0.10	\$67.50
GSG	Greenwood, Gail S.	Counsel	675.00	0.40	\$270.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	13.60	\$9,180.00
JIS	Stang, James I.	Partner	675.00	10.70	\$7,222.50
KHB	Brown, Kenneth H.	Partner	675.00	1.40	\$945.00
LAF	Forrester, Leslie A.	Other	475.00	2.00	\$950.00
SLL	Lee, Sophia L.	Other	395.00	3.50	\$1,382.50
				<hr/> 43.70	<hr/> \$24,757.50

---

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition [B130]	1.20	\$810.00
BL	Bankruptcy Litigation [L430]	11.00	\$7,025.00
CO	Claims Admin/Objections[B310]	18.00	\$7,810.00
GC	General Creditors Comm. [B150]	7.50	\$5,062.50
HE	Hearing	4.30	\$2,902.50
IC	Insurance Coverage	0.30	\$202.50
PD	Plan & Disclosure Stmt. [B320]	1.40	\$945.00
		43.70	<hr/> \$24,757.50

Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 4  
Invoice 129066  
October 31, 2021

---

**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Bloomberg	\$93.00
Conference Call [E105]	\$42.51
Outside Services	\$500.00
Pacer - Court Research	\$22.30
	<hr/>
	\$657.81

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Disposition [B130]</b>						
10/25/2021	KHB	AD	Confer with R. Charles re stipulation on sale of property owned by the Trust.	0.20	675.00	\$135.00
10/26/2021	KHB	AD	Review and revise stipulation re sale of property.	0.70	675.00	\$472.50
10/26/2021	GSG	AD	Review stipulation and email K. Brown re sale of property.	0.10	675.00	\$67.50
10/31/2021	KHB	AD	Emails to/from J. Stang re stipulation on sale of property by RE Trust.	0.20	675.00	\$135.00
				<b>1.20</b>		<b>\$810.00</b>
<b>Bankruptcy Litigation [L430]</b>						
10/04/2021	GNB	BL	Email with Iain A.W. Nasatir regarding motion to compel on shortened time; Email Ilan D. Scharf regarding same.	0.10	675.00	\$67.50
10/04/2021	JIS	BL	Call I. Nasatir regarding chapter 7 trustee claims hearing.	0.10	675.00	\$67.50
10/07/2021	IAWN	BL	Telephone conference with Stang re withdraw reference	0.10	675.00	\$67.50
10/08/2021	JIS	BL	Call with state court counsel regarding motion to withdraw reference.	0.40	675.00	\$270.00
10/08/2021	JIS	BL	Call with I. Nasatir regarding withdrawal of reference motion.	0.10	675.00	\$67.50
10/08/2021	LAF	BL	Research re: Judge Gonzalez for IAWN.	2.00	475.00	\$950.00
10/12/2021	IAWN	BL	Review St. Paul surreply	0.70	675.00	\$472.50
10/12/2021	IAWN	BL	Exchange emails with Lisa Ford re timing	0.10	675.00	\$67.50
10/12/2021	IAWN	BL	Exchange emails with Elaesser re timing	0.10	675.00	\$67.50
10/15/2021	IAWN	BL	Telephone conference w/ SCC re arbitration motion (p/o)	1.70	675.00	\$1,147.50
10/15/2021	IAWN	BL	Review Arrowood motion	0.80	675.00	\$540.00
10/15/2021	IAWN	BL	Review arbitration proceedings	0.50	675.00	\$337.50
10/15/2021	IAWN	BL	Draft and send email to Walker re arbitration	0.20	675.00	\$135.00
10/15/2021	JIS	BL	Review I. Nasatir email regarding reply on arbitration motion.	0.10	675.00	\$67.50
10/19/2021	IAWN	BL	Exchange emails with Walker re arbitration	0.10	675.00	\$67.50
10/19/2021	IAWN	BL	Review reply	0.60	675.00	\$405.00
10/22/2021	IAWN	BL	Telephone conference w/ SCC re hearing	0.50	675.00	\$337.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/25/2021	JIS	BL	Attend hearing regarding arbitration motion.	2.00	675.00	\$1,350.00
10/25/2021	JIS	BL	Call I. Nasatir follow up from arbitration hearing.	0.10	675.00	\$67.50
10/28/2021	IAWN	BL	Telephone conference w/ SCC re hearing on motion	0.70	675.00	\$472.50
				<b>11.00</b>		<b>\$7,025.00</b>

### Claims Admin/Objections[B310]

10/15/2021	JIS	CO	Review four motions for late filed claims and memo to committee re same.	0.80	675.00	\$540.00
10/18/2021	DHH	CO	Review filed claims for duplicate claims filed in other bankruptcy cases.	1.20	395.00	\$474.00
10/19/2021	DHH	CO	Review filed claims for duplicate claims filed in other bankruptcy cases.	1.20	395.00	\$474.00
10/19/2021	SLL	CO	Review and chart late filed claims.	1.00	395.00	\$395.00
10/20/2021	JIS	CO	Review proofs of claim for survivors who seek allowance of late filed claims.	0.70	675.00	\$472.50
10/20/2021	JIS	CO	Call with D. Braslow regarding late filed claims.	0.40	675.00	\$270.00
10/20/2021	DHH	CO	Review filed claims for duplicate claims filed in other bankruptcy cases.	1.20	395.00	\$474.00
10/21/2021	DHH	CO	Review filed claims for duplicate claims filed in other bankruptcy cases.	1.20	395.00	\$474.00
10/21/2021	SLL	CO	Review and chart late filed claims.	2.50	395.00	\$987.50
10/22/2021	DHH	CO	Review filed claims for duplicate claims filed in other bankruptcy cases.	1.20	395.00	\$474.00
10/25/2021	DHH	CO	Review filed claims for duplicate claims filed in other bankruptcy cases.	1.20	395.00	\$474.00
10/26/2021	DHH	CO	Review filed claims for duplicate claims filed in other bankruptcy cases.	1.20	395.00	\$474.00
10/27/2021	DHH	CO	Review filed claims for duplicate claims filed in other bankruptcy cases.	1.20	395.00	\$474.00
10/28/2021	DHH	CO	Review filed claims for duplicate claims filed in other bankruptcy cases.	1.20	395.00	\$474.00
10/29/2021	KHB	CO	Review decision on priest standing to object to claim.	0.30	675.00	\$202.50
10/29/2021	DHH	CO	Review filed claims for duplicate claims filed in other bankruptcy cases.	1.20	395.00	\$474.00
10/29/2021	GSG	CO	Review article and Thuma decision re standing to bring ADSF claim objection.	0.30	675.00	\$202.50

				<b>18.00</b>		<b>\$7,810.00</b>
<b>General Creditors Comm. [B150]</b>						
10/06/2021	JIS	GC	Draft email regarding meeting and reference withdrawal.	0.10	675.00	\$67.50
10/08/2021	IAWN	GC	Prep for call with SCC	0.80	675.00	\$540.00
10/12/2021	JIS	GC	Call survivor re status of case.	0.10	675.00	\$67.50
10/13/2021	JIS	GC	Review real estate report and email to Committee re same.	0.20	675.00	\$135.00
10/15/2021	IAWN	GC	Telephone conference with Stang re telephone call w/ SCC	0.10	675.00	\$67.50
10/15/2021	JIS	GC	Call with I. Nasatir re issues to be discussed on state court counsel call.	0.10	675.00	\$67.50
10/15/2021	JIS	GC	Committee call regarding arbitration and plan issues.	1.60	675.00	\$1,080.00
10/20/2021	JIS	GC	Call B. Hall regarding agenda for 10.20 committee call.	0.40	675.00	\$270.00
10/20/2021	JIS	GC	Call C. Paez regarding 10.20 meeting agenda.	0.20	675.00	\$135.00
10/20/2021	JIS	GC	Committee call regarding late filed claims.	0.70	675.00	\$472.50
10/22/2021	JIS	GC	Call with State Court Counsel re case issues, including October 25 hearing.	0.50	675.00	\$337.50
10/26/2021	IAWN	GC	Telephone conference re case status	0.70	675.00	\$472.50
10/26/2021	JIS	GC	Call with state court counsel regarding case issues	0.70	675.00	\$472.50
10/26/2021	JIS	GC	Attend committee call regarding mediation, dismissal order.	1.30	675.00	\$877.50
				<b>7.50</b>		<b>\$5,062.50</b>
<b>Hearing</b>						
10/24/2021	IAWN	HE	prep for hearing on compel arbitration	2.30	675.00	\$1,552.50
10/25/2021	IAWN	HE	Prep for hearing	0.30	675.00	\$202.50
10/25/2021	IAWN	HE	Attend hearing	1.70	675.00	\$1,147.50
				<b>4.30</b>		<b>\$2,902.50</b>
<b>Insurance Coverage</b>						
10/08/2021	IAWN	IC	Review Blank Rome invoices re insurance	0.30	675.00	\$202.50
				<b>0.30</b>		<b>\$202.50</b>



Pachulski Stang Ziehl & Jones LLP  
Archdiocese of Santa Fe O.C.C.  
05066 - 00002

Page: 8  
Invoice 129066  
October 31, 2021

---

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Plan &amp; Disclosure Stmt. [B320]</b>						
10/01/2021	JIS	PD	Review and forward updates on real property and cash sources.	0.10	675.00	\$67.50
10/08/2021	IAWN	PD	Telephone conference w/ SCC re options re plan	1.30	675.00	\$877.50
				<u>1.40</u>		<u>\$945.00</u>
<b>TOTAL SERVICES FOR THIS MATTER:</b>						<b>\$24,757.50</b>

---

**Expenses**

10/08/2021	BB	05066.00002 Bloomberg Charges through 10-08-21	93.00
10/20/2021	CC	Conference Call [E105] Loop Up Conference Call, JIS	42.51
10/31/2021	OS	Everlaw, Inv. 47221, AD Santa Fe database for the Month of October	500.00
10/31/2021	PAC	Pacer - Court Research	22.30
<b>Total Expenses for this Matter</b>			<b>\$657.81</b>

---

**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 10/31/2021**

**Total Fees \$24,757.50**

**Total Expenses 657.81**

**Total Due on Current Invoice \$25,415.31**

**Outstanding Balance from prior invoices as of 10/31/2021 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$1,235.62
122027	02/28/2019	\$30,157.50	\$277.50	\$7,539.37
122029	03/31/2019	\$42,255.00	\$0.80	\$10,563.75
122274	01/31/2019	\$58,605.00	\$1,970.37	\$14,651.25
123009	04/30/2019	\$26,220.00	\$578.73	\$6,555.00
123014	05/31/2019	\$10,110.00	\$106.52	\$2,527.50
123021	06/30/2019	\$76,215.00	\$1,864.39	\$19,053.75
123202	07/31/2019	\$92,205.00	\$4,995.56	\$23,051.25
123291	08/31/2019	\$38,487.50	\$353.32	\$9,621.87
123345	09/30/2019	\$23,355.00	\$10.10	\$5,838.75
124730	10/31/2019	\$44,688.50	\$685.56	\$11,172.12
124969	01/31/2020	\$198,857.50	\$4,949.13	\$49,714.37
125212	02/29/2020	\$229,550.00	\$5,024.17	\$57,387.50
125465	03/31/2020	\$49,632.50	\$2,118.58	\$12,408.12
125486	04/30/2020	\$27,742.50	\$908.67	\$6,935.62
125487	05/31/2020	\$85,545.00	\$500.00	\$21,386.25
125545	12/31/2019	\$37,482.50	\$1,240.04	\$9,370.62
125547	11/30/2019	\$100,575.00	\$9,556.08	\$25,143.75

125549	06/30/2020	\$65,475.00	\$500.00	\$16,368.75
126450	07/31/2020	\$141,957.50	\$1,546.61	\$35,650.43
126765	08/31/2020	\$71,419.50	\$876.72	\$17,854.87
126833	09/30/2020	\$7,512.50	\$567.41	\$1,878.12
126904	10/31/2020	\$89,325.00	\$2,234.47	\$22,331.25
126905	11/30/2020	\$86,197.50	\$641.07	\$21,549.37
126906	12/31/2020	\$151,132.50	\$506.90	\$37,783.12
127999	01/31/2021	\$183,875.00	\$2,017.29	\$185,892.29
128001	02/28/2021	\$123,550.00	\$1,724.62	\$125,274.62
128003	03/31/2021	\$51,705.00	\$722.35	\$52,427.35
128006	04/30/2021	\$23,482.50	\$647.44	\$24,129.94
128022	05/31/2021	\$18,427.50	\$505.20	\$18,932.70
128420	06/30/2021	\$14,242.50	\$152.70	\$14,395.20
128854	07/30/2021	\$3,847.50	\$9.50	\$3,857.00
128855	08/31/2021	\$6,952.50	\$1,000.06	\$7,952.56
128856	09/30/2021	\$9,180.00	\$61.20	\$9,241.20

**Total Amount Due on Current and Prior Invoices:**

**\$915,090.54**

EXHIBIT C

(Summary of Time Charges by Category)

# SUMMARY OF TIME CHARGES BY CATEGORY

Project Categories	Total Hours	Total Fees
Asset Analysis/Recovery [B120]	63.50	\$ 42,285.00
Asset Disposition [B130]	41.30	\$ 27,877.50
Appeals	366.50	\$246,947.50
Bankruptcy Litigation [L430]	726.30	\$488,570.00
Case Administration [B110]	1.00	\$ 675.00
Claims Admin/Objections [B310]	26.80	\$ 13,750.00
Compensation of Professional [B160]	21.80	\$ 13,997.00
Document Production	16.40	\$ 11,070.00
Financing [B230]	2.60	\$ 1,755.00
General Creditors Committee [B150]	177.20	\$119,637.50
Hearing	18.70	\$ 12,622.50
Insurance Coverage	295.10	\$198,732.50
Interviews	0.10	\$ 67.50
Litigation (Non-Bankruptcy)	0.30	\$ 202.50
Mediation	65.20	\$ 43,605.00
Outgoing Claims Analysis	597.50	\$394,140.00
PSZ&J Compensation	13.00	\$ 5,751.00
Plan & Disclosure Statement [B320]	277.30	\$186,615.00
Retention of Professional [B160]	10.10	\$ 6,817.50
Retention of Prof./Others	4.80	\$ 3,240.00
Stay Litigation [B140]	7.60	\$ 5,130.00
Travel	70.00	\$ 23,625.00
<b>TOTAL:</b>	2,803.10	\$1,847,113.00 <sup>5</sup>

<sup>5</sup> This amount has been reduced by \$1,270 to reduce the billing rates for Stanley Goldrich and William Ramseyer to the agreed upon rates of \$675.00

EXHIBIT D  
(Summary of Expenses)

# SUMMARY OF EXPENSES

<u>DESCRIPTION</u>	<u>AMOUNT</u>
Airfare	\$ 6,082.51
Auto Travel Expense	\$ 1,262.74
Bloomberg	\$ 1,640.90
Working Meals	\$ 2,739.13
Conference Call	\$ 3,134.70
Courtlink	\$ 51.28
Express Mail	\$ 83.21
Filing Fee	\$ 1,050.00
Hotel Expense	\$ 5,819.50
Legal Research	\$ 2,252.35
Legal Vision Atty Mess Service	\$ 52.55
Outside Services	\$ 3,000.00
Pacer-Court Research	\$ 419.70
Postage	\$ 50.20
Reproduction Expense	\$ 1,484.40
Reproduction/ Scan Copy	\$ 658.60
Research	\$ 8,000.00
Travel Expenses	\$ 1,571.81
<b>TOTAL</b>	<b>\$39,353.58</b>



EXHIBIT E  
(Declaration of James I. Stang)

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW MEXICO**

In re:

ROMAN CATHOLIC CHURCH OF THE  
ARCHDIOCESE OF SANTA FE, a New Mexico  
corporation sole,

Debtor.

Chapter 11

Case No. 18-13027-t11

**DECLARATION OF JAMES I. STANG IN SUPPORT OF SECOND  
INTERIM APPLICATION FOR ALLOWANCE AND PAYMENT  
OF PROFESSIONAL FEES AND REIMBURSEMENT OF  
EXPENSES OF PACHULSKI STANG ZIEHL & JONES LLP FOR THE  
PERIOD FROM OCTOBER 1, 2019 THROUGH OCTOBER 31, 2021**

I, James I. Stang, declare and state as follows:

1. I am a partner in the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZJ”) counsel to the Official Committee of Unsecured Creditors in this case (the “Committee”). I am an attorney at law duly authorized to practice before all of the courts of the State of New York.

2. I make this Declaration in support of the *Second Interim Application for Allowance and Payment of Professional Fees and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP for the Period from October 1, 2019 through October 31, 2021* (the “Application”).

3. I have personal knowledge of the facts set forth in this Declaration. If called as a witness I could and would competently testify thereto.

4. I reviewed this Application and this Declaration and reviewed and/or edited PSZJ’s bills (at **Exhibit B** to the Application). At my direction, a paralegal of PSZJ prepared Exhibits A, C and D to the Application. The Application and Exhibits A through D to the Application are true and correct to the best of my knowledge.

5. In accordance with Federal Rule of Bankruptcy Procedure 2016 and 11 U.S.C. § 504, I confirm that no agreement or understanding exists between PSZJ and any other person for the sharing of any of PSZJ's compensation for fees or expenses in this case, other than the distribution of profits among PSZJ's partners. Furthermore, PSZJ has not made, and will not make, any agreement to share compensation (excluding the sharing of profits among PSZJ's partners) or any other agreement prohibited by 11 U.S.C. § 504 or 18 U.S.C. § 155.

I declare under penalty of perjury under the laws of the United States of America and the State of New York that the foregoing is true and correct.

Executed on the \_\_\_\_ day of December 2021, at Los Angeles, California.

---

James I. Stang